



In the Matter Of:

TERRANCE PRUDE vs CANDACE DIXON

23-C-1233

TERRANCE PRUDE

May 13, 2024



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

* * * * *

TERRANCE PRUDE,

Plaintiff,

-vs-

Case No. 23-C-1233

CANDACE DIXON,

Defendant.

* * * * *

VIDEOCONFERENCE DEPOSITION OF TERRANCE PRUDE

Monday, May 13, 2024

1:10 p.m.

Reported by: SANDRA L. McDONALD

Page 2		Page 4	
1	VIDEOCONFERENCE DEPOSITION of TERRANCE PRUDE,	1	A Maybe.
2	a witness of lawful age, taken on behalf of the	2	Q More than 10?
3	defendant n the above-entitled cause, under the	3	A No, I don't believe so.
4	Federal Rules of Civil Procedure, pursuant to notice,	4	Q So somewhere between five and 10 times?
5	before SANDRA L. McDONALD, a Notary Public in and for	5	A No, I just said I don't think it's been more than
6	the State of Wisconsin, from the from the Wisconsin	6	10. I'm saying I don't want to give a definite
7	Secure Program Facility, 1101 Morrison Drive, in the	7	answer on something I'm unsure of.
8	City of Boscobel, County of Grant and State of	8	Q But you think it's somewhere between five and 10, so
9	Wisconsin, on the 13th day of May, 2024, commencing	9	more than five, less than 10?
10	at 1:10 p.m.	10	A No, I don't -- that's not what I said. I'm answering
11	* A P P E A R A N C E S *	11	your question. I don't know a ballpark. I don't
12	TERRANCE PRUDE,	12	know, to be specific. I'm not sure.
13	DOC Inmate No. 335878	13	Q Okay. But you think it's not more than 10?
14	WISCONSIN SECURE PROGRAM FACILITY	14	A It could be. I don't know. I'm saying I don't think
15	P.O. Box 1000	15	so, but I guess it's a qualified no, a qualified no.
16	Boscobel, Wisconsin 53805	16	I don't think it's more than 10, so a qualified no.
17	appearing by videoconference on his	17	Q Okay. So in any case, it sounds like this isn't your
18	own behalf;	18	first rodeo, so I won't give you the super detailed
19	JONATHON M. DAVIES,	19	instructions that I'd give to somebody that was maybe
20	Assistant Attorney General	20	doing this for the first time. But in general, do
21	WISCONSIN DEPARTMENT OF JUSTICE	21	you understand that you have a legal obligation to
22	17 West Main Street	22	tell the truth today?
23	Madison, Wisconsin 53703	23	A Yes.
24	daviesjm@doj.state.wi.us	24	Q And do you understand that you could be charged with
25	appearing by videoconference on	25	perjury if you don't tell the truth today?
	behalf of the defendant.		
	* I N D E X *		
	Examination By: Page:		
	Attorney Davies 3		
	(There were no exhibits marked for identification)		
	(Original transcript filed with the DOJ)		
Page 3		Page 5	
1	TERRANCE PRUDE,	1	A Yes.
2	having been first duly sworn on oath,	2	Q Okay. So I'm going to be asking you questions.
3	was examined and testified as follows:	3	You're going to be answering. I would like you to
4		4	tell me if you don't understand a question. Will you
5	EXAMINATION	5	do that?
6	BY MR. DAVIES:	6	A Yeah.
7	Q Good afternoon, Mr. Prude. We are here for the	7	Q And if you don't tell me that you didn't understand,
8	deposition in Eastern District Case 2023-08179.	8	I'm going to assume that you understood the question.
9	Mr. Prude, before we get going, have you ever been	9	Is that okay?
10	deposed before?	10	A Yep.
11	A Yeah, but what case did you say this is for?	11	Q All right. The court reporter is going to be taking
12	Q 23-CV-08179.	12	down everything we say. She can't take note of
13	THE REPORTER: I have -- I'm sorry.	13	shakes of the head or nods of the head or shrugs or
14	Jonathon, the notice I have says 23-C-1233.	14	anything like that, so please do your best to give
15	Q Okay. Yes, that's correct. Sorry, I was reading the	15	verbal answers, and instead of saying things like
16	wrong one. Yes, it's 23-C-1233. So, Mr. Prude, have	16	uh-huh, try and say yes or no, okay?
17	you ever been deposed before?	17	A Yeah.
18	A Yes.	18	Q All right. If you need to take a break at any time,
19	Q How many times have you been deposed?	19	just let me know. All I ask is that you finish the
20	A I'm not sure.	20	question that we're on before we take a break, and
21	Q More than three?	21	we'll work around that. So all this said, is there
22	A Yes.	22	anything that would prevent you from testifying
23	Q More than five?	23	truthfully and accurately today?
24	A More than who?	24	A No.
25	Q More than five?	25	Q Are you on any medications today?

<p>Page 6</p> <p>1 A No.</p> <p>2 Q Do you have any health issues today that would</p> <p>3 interfere with your ability to tell the truth?</p> <p>4 A No.</p> <p>5 Q Do you have any issues today that interfere with your</p> <p>6 memory?</p> <p>7 A No.</p> <p>8 Q All right. So we've already spoken --</p> <p>9 A Other than --</p> <p>10 Q -- about your previous depositions. Have you ever</p> <p>11 been a witness in a courtroom testimony?</p> <p>12 A In a courtroom testimony?</p> <p>13 Q Yeah.</p> <p>14 A Probably. Are you talking about me being physically</p> <p>15 in court or at a deposition or like what type of</p> <p>16 witness?</p> <p>17 Q Like in front of a judge.</p> <p>18 A Physically in front of a judge inside of a court?</p> <p>19 Q How many times do you think you've given testimony to</p> <p>20 a judge, so either, you know, remotely or in a</p> <p>21 courtroom?</p> <p>22 A Probably four times, three to four times, something</p> <p>23 like that maybe.</p> <p>24 Q Okay. Have you ever lied or provided misleading</p> <p>25 information in a court proceeding?</p>	<p>Page 8</p> <p>1 declarations, things like that.</p> <p>2 Q Okay. So you reviewed the declarations that you've</p> <p>3 submitted in this case. What other evidence did you</p> <p>4 review?</p> <p>5 A Documents.</p> <p>6 Q What documents specifically?</p> <p>7 A I guess some of your discovery requests, documents</p> <p>8 related to my motion to compel in discovery, things</p> <p>9 like that.</p> <p>10 Q You also said that you reviewed notes. What notes</p> <p>11 did you review?</p> <p>12 A My own notes, strategy notes. I said strategy notes.</p> <p>13 Q Strategy notes, okay.</p> <p>14 A Correct.</p> <p>15 Q All right. Did you talk to anybody about your</p> <p>16 deposition today?</p> <p>17 A I probably did.</p> <p>18 Q Who did you -- go ahead.</p> <p>19 A Well, not today particularly, but probably -- no, I</p> <p>20 didn't talk to nobody about it, but people do know</p> <p>21 that I've got a hearing today, yeah.</p> <p>22 Q Who knows that you have a -- you said hearing, but I</p> <p>23 think you mean deposition. Who knows that you have a</p> <p>24 deposition today?</p> <p>25 A Inmates.</p>
<p>Page 7</p> <p>1 A No.</p> <p>2 Q Have you ever submitted fabricated documents to a</p> <p>3 court?</p> <p>4 A No.</p> <p>5 Q Have you ever had any problems with your memory in</p> <p>6 general?</p> <p>7 A I guess with the passage of time, I guess everybody's</p> <p>8 memory kind of fades on certain things, but, no, I</p> <p>9 don't have any specific memory problems itself other</p> <p>10 than just the passage of time, when I did something</p> <p>11 or remember something, but no, I don't have no memory</p> <p>12 issues.</p> <p>13 Q Okay, thank you. Did you review any documents before</p> <p>14 this deposition today?</p> <p>15 A Did I review any? Yes.</p> <p>16 Q What did you review?</p> <p>17 A My legal documents in this case.</p> <p>18 Q When you say the legal documents in this case, do you</p> <p>19 mean the court filings?</p> <p>20 A Yeah, including those, correct.</p> <p>21 Q What besides the court filings did you review?</p> <p>22 A Evidence, strategy notes, things like that.</p> <p>23 Q What evidence did you review?</p> <p>24 A Evidence in this case, documents in this case that I</p> <p>25 have submitted, other things that I have, my</p>	<p>Page 9</p> <p>1 Q What inmates?</p> <p>2 A Just inmates in general.</p> <p>3 Q Did you tell them about it?</p> <p>4 A Yeah, that I've got a deposition today, yeah.</p> <p>5 Q So who did you tell?</p> <p>6 A Inmates.</p> <p>7 Q Which inmates?</p> <p>8 MR. PRUDE: Objection, it's</p> <p>9 irrelevant, what inmates. I don't think it's</p> <p>10 proportional to the needs of this case who I</p> <p>11 discussed what my strategies are and things of</p> <p>12 that nature.</p> <p>13 A So I don't know the inmates' names. Sometimes we</p> <p>14 talk legal conversations with each other about what</p> <p>15 each other's got going on. There's no particular</p> <p>16 names, just inmates.</p> <p>17 Q All right. Your objection is noted for the record.</p> <p>18 I do think that you are still required to answer</p> <p>19 questions on relevancy, that you object to on</p> <p>20 relevancy grounds, though. Are you refusing to</p> <p>21 answer that question right now?</p> <p>22 A No. I answered the question. You want me to give</p> <p>23 you a name for somebody that I don't remember, unless</p> <p>24 you want me to make up something, and I'm not gonna</p> <p>25 do that. But I just told you inmates in general.</p>

Page 10		Page 12	
1	I've just had general conversations.	1	with anybody outside of the institution about this
2	There's no face-to-face communication with	2	deposition?
3	inmates in this institution. I'm not sure if you've	3	A Probably, probably my mother, somebody like that.
4	been here or visited or rode through here or not, but	4	Q All right, your mother. And what did you say to your
5	there is no face-to-face communication with inmates.	5	mother?
6	Sometimes we talk through doors. Sometimes we talk	6	A Those are private communications -- like it's not
7	through vents. You might not know who you're talking	7	relevant -- just notifying her that I had a
8	to. So that's why I said inmates. If I knew	8	deposition, no substance, just deposition.
9	specific inmates' names, I would have gave them to	9	Q Did your mother --
10	you.	10	A And that was probably like a week and a half ago. I
11	Q So did you say that you were having a deposition	11	didn't know that I would be required to remember
12	today but you don't know who you said it to?	12	every single person I notified, but I don't remember
13	A Yeah, I said it to a couple inmates. Sometimes	13	everybody.
14	inmates get in a vent and ask questions about legal	14	Q Did your mother give you any advice about the
15	questions and we talk through the vents. We don't	15	deposition?
16	see each other's faces. Like if you understood the	16	A No.
17	dynamics of this institution, you would get it.	17	Q Did you communicate with any attorneys about this
18	Q Did any of these inmates respond to you after you	18	deposition?
19	said that you had a deposition?	19	A No.
20	A Yeah, yeah, they asked me what is a deposition.	20	Q Okay. Have you exchanged any written correspondence
21	Q What did they say?	21	with anybody regarding this lawsuit?
22	A They asked me questions like what is a deposition,	22	A No. I filed this case in 2022, so -- or 2023, I
23	like how does a deposition go, just asking me in	23	mean, so it's possible.
24	general because they've never experienced a	24	Q All right. Besides opposing counsel in this case,
25	deposition, so they asked questions about like what	25	who have you exchanged written correspondence with
Page 11		Page 13	
1	happens at a deposition, things like that. And I	1	about it?
2	explained to them that it's just a discovery tool,	2	A Inmate complaints, trying to do certain requests,
3	just like when you ask interrogatory questions, and	3	just general stuff, communication.
4	outside of that, it's just in-person and they're	4	Q All right, so inmate requests. And would it be fair
5	asking you the questions on the spot.	5	to say that you're saying you've submitted
6	Q All right. Did any of the inmates give you advice	6	administrative forms to the institution about this
7	about your deposition today?	7	case? Is that a fair summary of what you just said?
8	A No.	8	A Yeah, inmate complaints. Yeah, you could say that.
9	Q Besides inmates, did you discuss your deposition with	9	Q Okay. So besides administrative forms, have you sent
10	any prison staff?	10	any letters or correspondence to anybody about the
11	A Probably, probably just generally talking about I've	11	case?
12	got a deposition hearing. I'm sure I did.	12	A Probably. Like I say, the case has been in court
13	Q Do you remember which staff members you spoke to	13	since 2023, so it's possible, yeah. I don't remember
14	about the deposition?	14	exactly who. I'm always notifying people that I'm
15	A One of the -- I think her name is Bird. She's a PSU	15	litigating something in court. Whether it's my
16	worker. I saw her like I think Thursday or Friday.	16	criminal case or a writ of certiorari or something,
17	She asked me what all I've got going on, talking	17	yeah, I'm always notifying people.
18	about this week, and I told her I had a couple	18	Q Do you keep copies of the letters that you write to
19	family visits, I told her I got a deposition, things	19	people outside of the institution?
20	like that.	20	A No.
21	Q All right, so that was one staff member. I think you	21	Q All right. Have you told me everything you can
22	said the name was Bird. Any other staff members that	22	remember about correspondence you've sent regarding
23	you remember?	23	this lawsuit?
24	A No.	24	A Have I told you everything?
25	Q All right. Did you speak with anybody or correspond	25	Q Yes.

<p style="text-align: right;">Page 14</p> <p>1 A Probably not. There's probably some things I don't 2 remember, had I went back and actually thought about 3 it for a while. Like I said, this case has been in 4 court for almost a year now, so it's possible that -- 5 it's a lot of things that I probably don't remember 6 that I haven't told you about who I communicated with 7 or whatever, so, yeah, it probably is. 8 Q Okay. But those things are things that you don't 9 remember, and you also wouldn't have any copies of 10 the written correspondence; is that right? 11 A Would I have any written communications between the 12 people I communicated with or they communicated with 13 me? 14 Q Well, you testified a moment ago that you don't keep 15 copies of the letters that you send, right? 16 A Right, I don't keep copies of letters I send, 17 correct. 18 Q Okay. So if you don't keep copies and you don't 19 remember any other written communications, it's not 20 likely that you would be able to later remember more 21 communications, correct? 22 A No, I wouldn't say that's correct. What I said -- 23 Q It's not? Hmm, okay. 24 A What I said -- go ahead. 25 Q I'm sorry, I cut you off. Please finish your answer.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q And what is your incarceration for? 2 A Armed robbery. 3 Q And did you have a trial on that or is that the 4 result of a plea agreement? 5 A Plea agreement. 6 Q So you pled guilty to one count of armed robbery. 7 Anything else? 8 A No, that was just it. I pled guilty to armed 9 robbery. There was some read-ins, but I only pled 10 guilty to the armed robbery. 11 Q And what sentence were you given? 12 A 80-year prison sentence, 20 years probation, stayed 13 sentence. 14 Q When do you expect to be released from incarceration? 15 A Ain't no telling. It's a battle. It's always a war 16 for freedom around here. 17 Q You said it was an 80-year sentence and then 18 20 years -- what did you say, 20 years of extended 19 supervision at the end? So was it a 60-year term of 20 incarceration? That sounds like a lot, so it was 21 less than that, right? 22 A What is the question? 23 Q Do you think that you were sentenced to 60 years of 24 incarceration before the potential for extended 25 supervision?</p>
<p style="text-align: right;">Page 15</p> <p>1 A I'm finished. Go ahead. 2 Q All right, let's move on. So, Mr. Prude, I'm going 3 to ask you a few basic background questions before we 4 start talking about this case specifically. How old 5 are you? 6 A 42. 7 Q And before you went to prison what did you do for a 8 living? 9 A I had a job at Aldrich Chemical Company. 10 Q I'm sorry. Can you say the name of that company 11 again? 12 A Aldrich Chemical Company. 13 Q Can you spell that for the court reporter? 14 A A-l-d-r-i-c-h. 15 Q Thank you. And what is your highest level of 16 education? 17 A When I was free or now? 18 Q Education, what's your level of education? Did you 19 finish high school, undergrad, get your GED? 20 A No. 21 Q So what was the highest level that you did achieve? 22 A Probably 11th. 23 Q 11th grade, okay. And when did you begin your 24 current period of incarceration? 25 A 1999.</p>	<p style="text-align: right;">Page 17</p> <p>1 A You say do I think? 2 Q Yeah. 3 A I don't know if you understood my answer. Did you 4 hear my response? 5 Q No. Can you say that again? 6 A You asked me how much time did they gave me. I told 7 you they gave me an 80-year sentence with a 20-year 8 stayed sentence. Then you asked me do I got 9 60 years. That ain't what I was saying. 10 Q Yep, okay. I misheard you. Thank you for clarifying 11 that. So prior to this present term of incarceration 12 were you incarcerated for anything else? 13 A Yes. 14 Q What? 15 MR. PRUDE: Well, I would object to 16 my criminal history. It goes beyond -- the 17 statute only allows you to ask me questions 18 about convictions that happened within the 19 last 10 years, not within my whole life span. 20 The statute specifically requires you to or 21 allows you to ask me questions within the last 22 10 years, if I've been convicted of a crime 23 within the last 10 years. 24 MR. DAVIES: All right. Mr. Prude, 25 we're at a deposition, not in a formal court</p>

Page 18		Page 20	
1	hearing right now, so I'm entitled to discovery	1	Q Yes, yes.
2	on things that may not ultimately be admissible.	2	A No, not to my knowledge, not to my knowledge, no.
3	That remains to be determined. So I think that	3	Q Okay.
4	you are still required to answer the question,	4	A Well, does child support count? I guess you can --
5	but are you refusing to answer?	5	yeah, that's a civil process, so, yeah, I've had a
6	MR. PRUDE: That's not what I said. I	6	civil. My child's mother initiated a child support
7	just objected. I understand the rules here,	7	proceeding, but I wasn't a defendant, I was a -- I
8	man. I understand that when I object I've still	8	forgot the name of the term -- respondent.
9	got to answer, so you ain't gotta keep asking me	9	Q Okay. Have you ever been a plaintiff in another
10	am I refusing to answer. When I object to	10	civil lawsuit?
11	something, it's the same as when a lawyer would	11	A Yes.
12	object, and you just keep going. You ain't	12	Q How many civil lawsuits have you been the plaintiff
13	gotta ask me am I refusing anything. I	13	in?
14	understand the process.	14	A I'm not sure.
15	Q Okay. Well, in that case, thank you for clarifying,	15	Q More than five?
16	but can you answer the question then? What were you	16	A Yes.
17	incarcerated for before?	17	Q More than 10?
18	A Auto theft as a juvenile.	18	A Yes.
19	Q And when were you convicted of auto theft?	19	Q More than 15?
20	A I'm not sure, '97 sometime.	20	A Probably.
21	Q All right.	21	Q More than 20?
22	A 1997.	22	A I don't think so, but like I said, y'all got the
23	Q Besides the auto theft, were you convicted of	23	records. I'm pretty sure you can figure it out
24	anything else?	24	quicker than I can. You're a Department of Justice
25	A I think some -- yes, I was. To answer the question,	25	representative, so I'm pretty sure you can figure
Page 19		Page 21	
1	yes.	1	that out.
2	Q What were you convicted of?	2	Q All right. Let's move into some of your claims in
3	A I can't remember. I think it was disorderly conduct,	3	this case. So right off the bat, Mr. Prude, your
4	theft, I think second degree reckless injury, yeah.	4	Complaint refers to another inmate with the
5	Q Okay. Do you have any pending criminal cases right	5	initials T.H. And does T.H. refer to the inmate
6	now?	6	Titus Henderson?
7	A Anything pending?	7	A Correct.
8	Q Yeah.	8	Q All right. Let's talk about your relationship with
9	A No, I don't have any. Like when you say pending, you	9	Titus Henderson. How long have you known him?
10	mean like open charges against me or like stuff like	10	A I've been around him. I don't really know him. I've
11	that?	11	been around him for years in different institutions
12	Q Yep, that's exactly what I mean. Are there any open	12	and stuff like that, but I don't know him.
13	criminal cases against you right now?	13	Q When did you first meet him, do you think?
14	A Oh, no, I don't have any open charges that's against	14	A I'm not sure.
15	me, not to my knowledge, no.	15	Q Prior to -- do you think it was prior to 2018?
16	Q All right. Have you ever been a defendant in any	16	A Was it prior to 2018 when I met him, when I first
17	other civil lawsuits?	17	been around him?
18	A Have I ever been a defendant?	18	Q Yeah, when you --
19	Q Yes.	19	A Yes, yes, yes.
20	A You mean a plaintiff?	20	Q Okay. And I just want to make it clear that I'm
21	Q No, I'll ask you about being a defendant first, and	21	asking you about when you think you first met him, so
22	then I'll ask you about being a plaintiff in a	22	you think it was prior to 2018. Do you think it was
23	minute. So have you ever been a defendant in a civil	23	prior to 2015?
24	lawsuit?	24	A Yes.
25	A Have I ever been sued is what you're asking?	25	Q Do you think it was prior to 2012?

Page 22		Page 24	
1	A Yes.	1	A No. I indicated previously that we were having a
2	Q Do you think it was prior to 2009?	2	conversation with a third person. I was having a
3	A No.	3	conversation with a third person, and he was having
4	Q So you think it was somewhere between 2009 and 2012?	4	a conversation with a third person. There was no
5	A No, that's not what I said.	5	assistance between he and I. We were talking to the
6	Q I'm asking you.	6	same individual.
7	A I'm saying the first time I think I probably been	7	Q What was --
8	around him was probably in 2009. I'm saying that's	8	A And it was -- go ahead.
9	the first time, to my memory, I believe I was around	9	Q What were you talking to this individual about?
10	him.	10	A Legal matters.
11	Q Okay, thank you. That's what I was trying to get at.	11	Q What was the legal matter?
12	So where did you two meet sometime around 2009?	12	A I don't remember. I don't remember the subject
13	A Up here in Boscobel prison.	13	matter or what was it about. I just know it was a
14	Q Boscobel, all right. And describe your relationship	14	legal -- a legal communication.
15	with him when you both were in Boscobel.	15	Q So during your entire time or your entire time at
16	A There was none.	16	Boscobel with Titus Henderson, is it fair to say that
17	Q Do you -- you said you met him sometime around 2009	17	you never had any one-on-one communications with him?
18	in Boscobel. Do you remember any interactions you	18	A Correct.
19	had with him at that time?	19	Q When did you leave Boscobel?
20	A Just legal conversations, legal communications.	20	A You say when did we two leave Boscobel or when did I
21	A lot of times it wasn't even direct communications.	21	leave Boscobel?
22	Sometimes it would be a conversation where I'm	22	Q When did you leave Boscobel?
23	talking to somebody that I do know and he can be	23	A Oh, in 2011, I believe.
24	talking to the same person, and a lot of times you	24	Q And at that time did Titus Henderson also leave
25	don't need to be talking to each other, it could be	25	Boscobel or was he still there?
Page 23		Page 25	
1	us just engaging in the same conversation with the	1	A I don't know where he went or whether he stayed, or
2	one individual.	2	I'm not sure.
3	So it's a lot of those conversations where group	3	Q When you left Boscobel where did you transfer to?
4	conversations happen and there was a lot of people	4	A Waupun.
5	involved in the conversation. We really don't know	5	Q And did you meet Titus Henderson again at Waupun?
6	each other, but everybody shares an idea about	6	A I didn't meet him there, but I seen him there.
7	something legal that's going on or how complaints are	7	Q When did you first see Mr. Henderson at Waupun?
8	filed or whatever.	8	A I can't remember the exact year.
9	Q Was there a formal like legal group that you were	9	Q All right. What's your best guess? Otherwise, I can
10	both a part of, or were these casual conversations?	10	do the thing where I go back a few years at a time if
11	A Just casual conversations over a tier.	11	you prefer we do that.
12	Q I'm sorry. Can you repeat that, over a what?	12	A You said you want me to guess?
13	A Over a range, a tier.	13	Q What's your best guess of when you first met
14	Q Okay. So do you remember any one-on-one interactions	14	Titus Henderson again at Waupun?
15	that you had with Titus Henderson at Boscobel?	15	A I'm not going to guess.
16	A Do I remember any other interaction that I had with	16	Q Okay. Besides Boscobel and Waupun, have you ever
17	him at Boscobel?	17	interacted with Mr. Henderson at any other
18	Q Yeah.	18	institution?
19	A No, I don't remember other than just what I've	19	A Green Bay.
20	stated, no.	20	Q When did you transfer to Green Bay?
21	Q Okay. And when you say regarding legal questions or	21	A 2018, I believe.
22	legal matters, were you helping Titus Henderson with	22	Q All right. Before we go on to Green Bay, let's go
23	a specific lawsuit?	23	back to Waupun. Do you remember any specific
24	A No.	24	interactions you had with Mr. Henderson at Waupun
25	Q Was he helping you with a specific lawsuit?	25	prior to 2018?

Page 26		Page 28	
1	A No, I don't remember no interactions prior to '18.	1	be talking to a person over the tier that you don't
2	Q All right. Let's skip forward to Green Bay then.	2	even know, but it's not that y'all are talking
3	So you said you transferred to Green Bay in 2018.	3	directly to each other. Everybody is involved. You
4	When did you first meet Titus Henderson again at	4	probably have seven, eight different prisoners on the
5	Green Bay?	5	range having a group conversation, and maybe only
6	A We were both in Administrative Confinement.	6	three of those eight know each other, where the other
7	Q And approximately when was this?	7	five may just be engaging in the conversation because
8	A Between 2018 and -- or 2019 and 2021, I guess you	8	they might know something about it or they might've
9	could say.	9	got transferred from another institution where
10	Q Were you on Administrative Confinement that entire	10	they're aware of how a certain policy happened over
11	time?	11	there that's not happening where we're currently at
12	A Yes.	12	and they might give their input about how something
13	Q Why were you --	13	took place under the policy.
14	A Well, no. I was on DS, and then I went back to AC,	14	Like it's a lot of those conversations, where
15	and then I probably went back to DS and then went	15	like I can't say -- is it possible that me and him
16	back to AC, so no, I wasn't in Administrative	16	had a direct communication? It's possible. In a
17	Confinement that entire time, but I was in	17	group conversation like that, it's possible where he
18	Segregation the entire time.	18	might have said something where I had a different
19	Q And you said that Mr. Henderson was also on	19	experience with a certain policy. It's possible that
20	Administrative Confinement?	20	something like that happened, but I don't
21	A I don't know that. I knew he was in Segregation. I	21	specifically remember just me and him having a
22	can't tell you what his status was.	22	conversation.
23	Q So did all of your interactions between 2018 and 2021	23	Q Okay. So it's fair to say that you don't remember
24	happen when you were in Segregation?	24	the details of any of those group conversations you
25	A Correct, when we was around each other, correct. We	25	both might have been in; is that right?
Page 27		Page 29	
1	was around each other not for the entire period	1	A Do I remember the details? Yeah, probably talking
2	between '19 and 2021, but there was a period of time	2	about Administrative Confinement, how certain
3	where we were on the same range.	3	institution's policies are as it relates to how they
4	Q Okay. So during the time that you were on the same	4	do their hearings for Administrative Confinement,
5	range -- and again we're talking generally about the	5	what property limits you can have on Administrative
6	period 2019 to 2021 -- how often do you think you saw	6	Confinement in different institutions, how many phone
7	Mr. Henderson?	7	calls you can have, like things like that. Like
8	A Not often. He walked past my cell a couple times, I	8	disparities in treatment amongst statuses in
9	guess. Any time they had to take inmates over there	9	institutions, that was the topic.
10	they had to walk past my cell, so I probably seen him	10	Q How would you describe your relationship with him
11	in passing, something like that.	11	during that period, 2019 to 2021? Would you say you
12	Q Do you recall any specific conversations that you had	12	were on good terms, neutral terms or bad terms?
13	with him during that time?	13	A I wouldn't say good or bad. Like I say, we wasn't
14	A No.	14	enemies. We wasn't -- we never had a falling out or
15	Q Did you ever exchange any written communications with	15	nothing like that, no bad blood or nothing like that,
16	him during that time?	16	or at least not to my knowledge.
17	A No.	17	Q So would you say it was a pretty neutral
18	Q So your interactions with him were just limited to	18	relationship?
19	seeing him as he walked by your cell?	19	A A mutual relationship?
20	A We -- I can say this. Me and him never had any	20	Q Neutral.
21	direct communication. We've never directly like did	21	A Oh, yeah, I guess you could say that. There was no
22	anything. Any time me and him had a communication	22	bad blood or good blood. Like there was nothing from
23	about anything it's always a third or fourth person	23	my perspective. I'm speaking from my perspective.
24	involved in the conversation.	24	I can't --
25	There's a lot of that that goes on where you can	25	Q I understand, all right. So let's skip forward in

<p style="text-align: right;">Page 30</p> <p>1 time to 2022. Did anything change in your 2 relationship in 2022? 3 A Can you say that again? You kind of skipped on that. 4 Q Yeah, excuse me. Let's skip forward to 2022. Did 5 anything change in your relationship in 2022? 6 A In 2022 I would say so, yeah. I believe so. 7 Q What changed? 8 A Prison politics, I guess you could say. There was a 9 situation where I guess you could say he was -- he 10 believed that somebody gave me some porn, some 11 pornography. 12 And they called me Spook, they used to call me 13 Spook. And it was another inmate -- it was a couple 14 inmates besides me, there were a couple inmates whose 15 names rhymed with Spook, like Snoop or Scoop. Like 16 there was a different -- a bunch of those type of 17 names in that vicinity, and he thought that somebody 18 gave me pornography. And that, I guess that belonged 19 to him. 20 But didn't nobody give me porn. I don't think 21 he believed it. I think he just thought I wanted to 22 keep it, but I kept telling him that I didn't get 23 anything, I didn't have nothing. So that was the 24 first -- 25 Q When -- go ahead.</p>	<p style="text-align: right;">Page 32</p> <p>1 it was never a direct face-to-face type of situation. 2 Q Who was that individual that he used to send messages 3 through? 4 A I don't know his nickname, but I believe his real 5 name is Jaleel. I think it's J-a-l-e-e-l. I don't 6 remember. I don't know his last name, but it's 7 Jaleel. They call him J or Jaleel or something, 8 yeah, Jaleel, almost like a Muslim name. I don't 9 even know if that's his real name or not. It could 10 be a Muslim name, because I know a lot of Muslims 11 named Jaleel, so but I knew him as Jaleel. 12 Q All right. And did you tell this Jaleel that you 13 didn't have pornography? 14 A No, he -- and this is where like a lot of issues 15 started happening where the porn was supposed to be 16 of Dixon. It was supposed to be photographs of her 17 naked. 18 From what I'm learning, it was supposed to be 19 some of her where she had a mask on and then others 20 with like a Mardi Gras mask, and then it was some 21 where it was supposed to be TextBehind pictures where 22 it didn't show her face, it just showed body parts, 23 her body parts and stuff like that, and then it was 24 supposed to be other pictures where it did show her 25 face. So there was like three different types of</p>
<p style="text-align: right;">Page 31</p> <p>1 A Go ahead. 2 Q I was just going to say when, when did that incident 3 happen where he thought that you had pornography? 4 A Oh, in 2022 sometime. I can't remember. It was like 5 2022, I would say. 6 Q Did you think it was early '22, winter, summer, fall? 7 Do you have any idea? 8 A Probably mid. I don't want to lock myself into an 9 answer and I could be wrong. Like I said, I believe 10 it was kind of warm outside, so probably closer to 11 the summer, or if not in the summer, sometime like 12 that. 13 Q Okay, all right. You have this interaction then, and 14 did he make any threats towards you at that time? 15 A No, not at that time, no. 16 Q Okay. So how was that situation resolved? 17 A I don't know if it was ever resolved. Like it was 18 always a belief that I kept some pornography. That 19 was the belief as far as what triggered everything. 20 Q Did you ever speak to Mr. Henderson directly about 21 that issue? 22 A No. It was always through third parties or other 23 people who knew him. Well, it was one individual 24 that I guess he used to talk through or send me 25 messages about the situation. So, no, it wasn't --</p>	<p style="text-align: right;">Page 33</p> <p>1 pictures. 2 They was saying that it was one where that did 3 show her face in some of the naked pictures, and then 4 it was supposed to be others that just had like the 5 eyes kind of covered where it was like a little -- 6 like a Mardi Gras face mask that just covered the 7 eyes. Then the third set of pictures was supposed to 8 be where it was her body, different parts of her 9 body, but you couldn't see the face. 10 So this is information I learned from Jaleel, 11 and then who had -- what was the pictures they 12 thought I took or had and the substance of the 13 pictures, that's where I learned that it was 14 supposed to be of her, of Dixon, some pictures of 15 her, I guess. 16 Q So I just want to make sure that I'm understanding 17 what everybody's position was. So was Mr. Henderson 18 saying that those pictures actually belonged to him 19 and that you had them when you shouldn't? 20 A I don't know what he -- I don't know if that was his 21 position or not. All I know is he thought that I had 22 naked pictures of Dixon and Jaleel was involved in 23 like investigating whether or not I had naked 24 pictures of Dixon. And I was telling him I don't got 25 them, I don't even -- like I never saw them.</p>

<p style="text-align: right;">Page 34</p> <p>1 I was aware that Dixon, through rumors, that she</p> <p>2 was selling pictures of herself to inmates, but I</p> <p>3 never saw any. So that was the issue, and they</p> <p>4 thought -- Titus and Jaleel thought that I was</p> <p>5 somehow, I guess, cuffing or handcuffing the pictures</p> <p>6 or something. Like that was the issue. That was the</p> <p>7 thing that started in 2022.</p> <p>8 Q Did they want you to give them the pictures?</p> <p>9 A Yeah, they wanted me to give back the pictures that I</p> <p>10 didn't have. I never had them. I never saw them.</p> <p>11 Q Okay.</p> <p>12 A But I was aware of --</p> <p>13 Q So you said give back the pictures. Well, go ahead.</p> <p>14 A Yeah, the reason I said give back was because they</p> <p>15 thought I had them. That's why they wanted me to</p> <p>16 give them back, and I was saying I never had them to</p> <p>17 give them back. Like I never had them, but they</p> <p>18 thought I had them and they wanted me to give them</p> <p>19 back, but I kept saying, "I don't have no pictures."</p> <p>20 Q Okay. But I guess what I'm trying to understand is</p> <p>21 were they saying that they had the pictures</p> <p>22 originally and that you got them somehow --</p> <p>23 A Right.</p> <p>24 Q -- or did they never have the pictures but they just</p> <p>25 wanted them?</p>	<p style="text-align: right;">Page 36</p> <p>1 A No. He didn't give me no pictures. That's what I'm</p> <p>2 saying.</p> <p>3 Q Right.</p> <p>4 A That's the whole issue is that didn't nobody give me</p> <p>5 pictures, so when I'm talking to Jaleel about it,</p> <p>6 he's explaining to me that they gave it to somebody</p> <p>7 to give to this person who they was trying to give it</p> <p>8 to. They thought I was that person, and I'm telling</p> <p>9 them, "Ask the person who y'all gave it to to look me</p> <p>10 in my face and tell me that he gave me anything."</p> <p>11 Because the person, whoever, he had to have my name</p> <p>12 mixed up with somebody else. It wasn't me.</p> <p>13 Q So who was that middleman?</p> <p>14 A I don't remember his name. I remember him saying his</p> <p>15 name at the time, but I don't remember the middle</p> <p>16 person's name that they're supposed to have gave the</p> <p>17 pictures to. That's the thing. I never met this</p> <p>18 middle person, but in the conversation that I was</p> <p>19 having with Jaleel, he was mentioning the name of the</p> <p>20 individual who was supposed to -- who they supposed</p> <p>21 to have gave the pictures to, and I was saying I</p> <p>22 didn't have the pictures.</p> <p>23 Q okay. Do you know if this Jaleel had any security</p> <p>24 threat group or gang affiliations?</p> <p>25 A Not to my knowledge. I don't know. I thought he</p>
<p style="text-align: right;">Page 35</p> <p>1 A No, they had the pictures. I don't know how they</p> <p>2 believed I got them. I was under the impression that</p> <p>3 they was trying to give them to somebody or somebody</p> <p>4 indicated that the pictures went to somebody who</p> <p>5 rhymed with my name. That's why I told you at the</p> <p>6 beginning that they used to call me Spook.</p> <p>7 So I'm thinking that, according to Jaleel, that</p> <p>8 they believed that whoever gave -- whoever Titus or</p> <p>9 Jaleel gave the pictures to to give to a third</p> <p>10 person -- because that's how a lot of times people</p> <p>11 get stuff. Like they'll give -- like say if I gave</p> <p>12 you something and tell you to give it to whoever.</p> <p>13 Like you will just be the middle person, but if you</p> <p>14 made a mistake and gave it to the wrong person, they</p> <p>15 would go back to that person and try to get it back</p> <p>16 because they gave it to the wrong person.</p> <p>17 So I guess when they told -- whoever was</p> <p>18 supposed to be the person who was supposed to have</p> <p>19 been transporting the pictures must've told them,</p> <p>20 "I gave the pictures to Spook," and that's why they</p> <p>21 came to me like, "Hey, we heard from dude he gave you</p> <p>22 some pictures." And I told them, "Dude didn't give</p> <p>23 me nothing."</p> <p>24 Q Okay. Do you know who the person was that</p> <p>25 misdelivered the pictures?</p>	<p style="text-align: right;">Page 37</p> <p>1 was just a Muslim. That's all I know. I thought he</p> <p>2 was just a Muslim, that's it. As far as being</p> <p>3 associated with something, that's all I believe that</p> <p>4 he was associated with, so I'm not sure.</p> <p>5 Q So how long do you think this back and forth with the</p> <p>6 pictures went on for? You said it probably started</p> <p>7 sometime around the middle or summer of 2022. How</p> <p>8 long do you think that you went back and forth about</p> <p>9 the pictures?</p> <p>10 A Probably a couple times. One time even Dixon came to</p> <p>11 my cell about the pictures.</p> <p>12 Q Right. We'll come back to that in a minute. We'll</p> <p>13 definitely talk about your conversations with Dixon,</p> <p>14 but just to make things easier, let's just stick to</p> <p>15 Mr. Henderson for now.</p> <p>16 So you went back and forth a couple times with</p> <p>17 Henderson and Jaleel about the pictures, but you</p> <p>18 never spoke to Henderson directly about them; is that</p> <p>19 correct?</p> <p>20 A Correct.</p> <p>21 Q All right. So after the incident with the pictures,</p> <p>22 what was your next interaction with Mr. Henderson?</p> <p>23 A It was just messages. Like I say, it was always just</p> <p>24 messages, third-party messages. Like it was always a</p> <p>25 new message here from Jaleel or from him about the</p>

Page 38		Page 40	
1	pictures. It was always him intertwined with Jaleel	1	a threat issued against me. That's the best I can
2	somewhere about the pictures. It was always that.	2	remember. As far as the exact word play, it was --
3	Q Did Jaleel specifically tell you that he was acting	3	it was a threat issued against me about if I don't
4	on behalf of Henderson?	4	turn the pictures over.
5	A He said that was his guy, so yeah. I know that that	5	Q All right. And what was the nature of the threat?
6	was his guy, yeah.	6	Did he say -- did he say that he was going to beat
7	Q Okay. So let's try and remember as many	7	you up? Did he say he was going to stab you? Do you
8	conversations with Jaleel as we can. So you said	8	remember any details?
9	that you went back and forth twice or so during the	9	A No, it wasn't -- I don't think people in prison let
10	initial incident. Did you have any more back and	10	you know how they're gonna attack you. It was just a
11	forth with Jaleel after that?	11	threat, a threat against my safety. It was a threat
12	A I'm sure I did, yeah, yeah, yes.	12	of physical violence, so yeah.
13	Q How many times do you think you spoke with Jaleel	13	Q But do you remember exactly what he said?
14	overall?	14	A He told me that him and his brothers was gonna do
15	A Maybe 10, maybe more.	15	something to me, but as far as the specifics, there
16	Q Is it somewhere around 10 times?	16	was no, "Yeah, we're gonna stab you," or, "We're
17	A Yeah, somewhere around 10 times, yes --	17	gonna hit you upside the head with a lock in a sock,"
18	Q All right. And what --	18	or nothing specific. It was just a threat.
19	A -- or more.	19	Q Right, I understand. So I just want to try and be as
20	Q Go ahead. I'm sorry.	20	clear as possible about what was said and by who. So
21	A Or more, 10 or more, but yeah, I'll just say 10.	21	you understood that he was threatening you, but you
22	Q All right, so 10 or more. Would you say it was less	22	don't remember the exact words used; is that fair to
23	than 15, so somewhere between 10 and 15?	23	say?
24	A Probably, yeah.	24	A You said I remember that he was threatening me, but I
25	Q And when was the last one of these conversations with	25	don't remember the specific words he used?
Page 39		Page 41	
1	Jaleel?	1	Q Yeah, is that fair, is that accurate?
2	A The last, what was one of the last communications?	2	A Yeah, I guess you could say that, man. I don't --
3	Q Yeah, when was the last time you talked to Jaleel?	3	like I said, when somebody hits you with a threat, I
4	A 2022.	4	didn't factor in all the details. Like I said, if
5	Q Right. And again, do you think -- obviously, it was	5	somebody tells you they're gonna do something to you
6	after the initial conversations in the summer, so	6	if you don't do this or do that, that's a threat.
7	when did you think it was, like a month later, two	7	Like that's how threats are issued in the
8	months later?	8	institution.
9	A I'm not sure, probably October, November, September,	9	People don't specifically tell you how they're
10	probably somewhere around there.	10	gonna go about doing something. It was just, "Hey,
11	Q All right. So sometime in the fall of 2022, October	11	if you don't turn this over, man, me and my brothers,
12	or November, was your last conversation with Jaleel?	12	we're gonna have to respond to that." It was a
13	A It could have been, correct.	13	threat there.
14	Q Okay. And during that last conversation what did	14	Q What do you think he meant by my brothers? What does
15	Jaleel say to you?	15	that mean?
16	A That if I didn't give up the pictures that something	16	A I don't know, him and his comrades, whoever he's
17	was gonna happen to me.	17	rotating with, him and his friends, him and his
18	Q Is that the word he used, something?	18	whoever.
19	A No, he didn't use the word something. I'm	19	Q Do you know or did you know at the time if he had any
20	paraphrasing.	20	friends in the institution that might be dangerous to
21	Q All right. Can you tell me as best as you can	21	you?
22	remember what he said?	22	A No, not to my knowledge. I don't -- no, I can't say
23	A Verbatim what he said?	23	I knew whether or not he had somebody specifically
24	Q Yeah, as best as you can remember.	24	that would cause harm to me. No, I didn't know
25	A Yeah, like I said, as best as I can remember, it was	25	specifics.

Page 42		Page 44	
1	Q All right, okay. And it was -- was it implied that	1	he would come back and try and double-check my facts
2	if you gave back the pictures which you didn't have,	2	of what I told him to see if it matched up with what
3	then they wouldn't -- they wouldn't hurt you?	3	I told him previously, so it was a lot of that going
4	A Yeah, they wanted me to pay for them. They wanted	4	on.
5	me to either give them back or pay for them, and I	5	Q And I think I might have misunderstood something
6	said -- it was a situation where -- I could be wrong,	6	there. Did you say that you did have porn in your
7	but I think -- and the only reason I say this is	7	possession, just not of Dixon?
8	because in my experience I've seen this happen, where	8	A Correct.
9	inmates will come to somebody and say, "Hey, we gave	9	Q So when he was asking you for descriptions, you were
10	you some soap, so you owe us this," and the person	10	describing this other porn, but not -- but not the
11	will be like, "You didn't give me no soap," but	11	porn from Dixon that he was asking for; is that
12	that's their justification.	12	right?
13	It's like an extortion attempt where they'll say	13	A Correct, correct.
14	they gave you something but they never did, but it's	14	Q Okay.
15	just an extortion attempt where they'll try to act	15	A Porn is a normal thing in prison. Mostly everybody
16	like you're in debt for something that somebody gave	16	has porn. But, yeah, he -- I had some, but not the
17	you, which they know they never gave you. It's just	17	specific one that he thought I had. So it's kind of
18	a ruse. It's just a trick to get people to pay out	18	easy to go to someone and say, hey, you got some porn
19	money.	19	that somebody gave you that you ain't supposed to
20	So when somebody came to me and say, "Hey, we	20	have.
21	gave you some porn, you owe us this if you don't give	21	It's kind of like everybody has porn damn near.
22	it back," they know you can't give it back because	22	So it's like who is going to say no, I don't have
23	they know you don't got it. So it's the alternative	23	porn? Like everybody has it, so that's why I say I
24	is, "Well, if you don't give us back the porn, then	24	think it was a trick to try to get something out of
25	you've got to pay us, because that was our shit."	25	me. They knew I didn't have it. You know, that was
Page 43		Page 45	
1	Like that's how they -- that's their approach.	1	my view, that they was just trying to get some money
2	So that's how I took it, that they know they didn't	2	out of me.
3	give me nothing. It was an extortion attempt.	3	Q Was the porn that you had of any prison official or
4	Q Okay. So going back to this conversation, after he	4	anybody at the institution?
5	had made this threat, after Jaleel had made this	5	A No. My porn was like real-life porn stars like
6	threat, did you say anything else?	6	Pamela Anderson, or I don't know if you want to use
7	A Like I said, we went back and forth about the fact	7	this deposition to talk about porn star names, but I
8	that Dixon was the person on the pictures. We	8	had --
9	discussed that. I told him, "Man, I've had porn	9	Q That's okay. I just -- go ahead.
10	before, but I ain't never had no porn of a	10	A Right.
11	correctional officer in my cell or none of that."	11	Q No, I just wanted to ask you if it was of anybody
12	But we -- I said, "I would've remembered seeing some	12	specific at the institution, but it sounds like it
13	porn of a correctional guard, but I never had none."	13	wasn't, okay. So you went back and forth with him
14	We went back and forth about it. He was	14	about the details of that, and you told him that you
15	describing the pictures, asking me what type of porn	15	didn't have the porn of Dixon, right?
16	did I have, maybe I didn't know that that was her,	16	A Correct.
17	where I described some of the porn I had. And like	17	Q And how did that last conversation with Jaleel end
18	he -- I guess in the description of the porn that I	18	other than he -- so what we have so far is he said
19	had at the time, he was like trying to figure out if	19	something that made you understand that he was
20	it matched the description of her and some of the	20	threatening you, you went back and forth about the
21	poses, I guess, that she was in in the pictures.	21	details of what the porn was. And then after that
22	And so, yeah, there was many conversations about	22	was anything else said, or did he walk away? How did
23	that where he would come back and double back and be	23	it end?
24	like, "Hey, how did you say that picture looked? How	24	A Yeah, after the threat there was no more
25	did that picture look?" Like there were times where	25	conversation, but there was conversations prior to

Page 46		Page 48	
1	that before the threat was issued. The threat was	1	do you remember the specific words that he used?
2	the last communication. There was no need for	2 A	No, I don't remember the specific words, but the gist
3	further communication after the threat was issued,	3	of it was, "Did Jaleel talk to you about how we plan
4	but like I said, that was the last communication, the	4	to respond if we don't get our porn back?" And I
5	threat, but there were multiple conversations leading	5	told him yeah, and he said, "That still stands." So
6	up to that that were not threats.	6	he was basically corroborating whatever Jaleel said.
7 Q	Okay, all right. So those were your conversations	7 Q	Would anybody else have overheard this conversation?
8	with Jaleel. And again, just to be extra clear about	8 A	I'm not sure. I can't tell you whether or not
9	it, you never had any direct conversations at all	9	somebody --
10	with Titus Henderson; is that right?	10 Q	Were there -- go ahead.
11 A	No, not directly.	11 A	Go ahead.
12 Q	And is that true -- skipping ahead, is that true for	12 Q	All right. Were there other people in the shower
13	all times leading up to the assault in March of 2023,	13	with you?
14	that you never spoke with Mr. Henderson directly?	14 A	Yes.
15 A	No, that's not true.	15 Q	How many people were there?
16 Q	Okay. So when did you speak with Mr. Henderson	16 A	Probably like 30 or 40. It's a big shower room.
17	directly?	17 Q	Do you remember the names of anybody who was standing
18 A	In the shower in like I think it was January or	18	closest to you?
19	February. Yeah, February maybe. Yeah, in February,	19 A	No.
20	February of 2023, where he confronted me again about	20 Q	Do you remember anybody at all who was in the shower
21	the pornography of Dixon, the porn of Dixon.	21	at the time?
22 Q	So just to make the timeline clear, so you had your	22 A	Do I remember anybody at all that was in the shower?
23	last conversation with Jaleel sometime roughly in	23 Q	Yeah, the names of anybody who was there.
24	October/November of 2022, and then the next	24 A	No, not off the top of my head. No, I don't know,
25	conversation that you had about it was with Henderson	25	no.
Page 47		Page 49	
1	in February of 2023; is that what you're saying?	1 Q	All right. So you have that conversation in February
2 A	Correct.	2	of 2023. After that conversation did you have any
3 Q	Okay. So let's talk about that conversation in	3	more interactions with Mr. Henderson?
4	February of 2023. You say you were in the shower.	4 A	No.
5	What happened?	5 Q	Not until the actual assault in March?
6 A	He told me to come over. I walked over there with a	6 A	Right.
7	towel on. He asked me do I got -- am I gonna turn	7 Q	Okay. So again I just want to be clear about the
8	over the porn, and I told him, "I don't know what	8	timeline here. So you're saying that prior to this
9	y'all talking about. I already talked to Jaleel. I	9	February 2023 conversation with Mr. Henderson you
10	told Jaleel I don't have no porn, especially no --"	10	hadn't communicated with him directly, but you
11	I said, "I got porn, but not of Dixon, not of	11	communicated through Jaleel. And then after that
12	Correctional Officer Dixon. I ain't got no porn of	12	February conversation, you didn't have any other
13	her. I don't even know where y'all got that from. I	13	conversations with Mr. Henderson until the assault in
14	don't know why y'all believe I have it. If I had it,	14	March of 2023; is that correct?
15	I would have gave it to y'all. I don't have it." So	15 A	Yeah. I think you skipped a lot of incidents. You
16	that was the gist of the conversation in the shower.	16	skipped over communication with Dixon. You skipped
17 Q	Okay. So you explained that you didn't have it, and	17	over a bunch.
18	then do you remember anything else that was said by	18 Q	Oh, I understand. I'm just focusing on interactions
19	either of you during that conversation?	19	with Mr. Henderson right. Now we'll come back to
20 A	Yeah, that if I didn't turn it over, the threat with	20	Ms. Dixon. And then after the shower conversation in
21	Jaleel still stands, the threat still stands if I	21	February of 2023, did you have any other
22	don't turn it over or pay.	22	conversations with Jaleel?
23 Q	Okay. So again I want to be specific about what was	23 A	No, not to my knowledge.
24	said, as specific as possible. So you understood	24 Q	Did you have any --
25	that he was reiterating the threat from Jaleel, but	25 A	The last -- go ahead.

Page 50		Page 52	
1	Q Did you have any conversations with anybody at all	1	have heard it; is that fair to say?
2	who was acting on Mr. Henderson's behalf?	2	A Correct.
3	A No.	3	Q Okay. So you shook your head, and then was that the
4	Q Okay. So in terms of your communications with	4	end of that interaction?
5	Mr. Henderson either directly or indirectly, it was	5	A Yeah. I turned back around and walked back to my
6	the approximately 10 conversations that you had with	6	shower stall to finish drying off, because I still
7	Jaleel and then the one conversation that you had	7	had my sandals on and was drying off.
8	with Mr. Henderson in the shower in February 2023,	8	Q All right. What was the next conversation that you
9	correct?	9	you had with Mr. Henderson?
10	A Yeah, we had a couple conversations in the shower, me	10	A There was no next conversations. It was only two
11	and Henderson, on different occasions.	11	shower incidents. That's the two I gave you.
12	Q On different occasions, okay, okay. So the first one	12	Q Okay, two incidents in the shower but no other
13	that you were just telling me about, when in February	13	communications with Mr. Henderson, gotcha. And then
14	was it, early February?	14	just to be clear, Jaleel --
15	A Probably mid February.	15	A Prior to --
16	Q Mid February, okay, so that was one conversation.	16	Q Go ahead.
17	What was the next conversation that you had with	17	A Prior to the assault, those are the only two
18	Mr. Henderson?	18	conversations, correct.
19	A Probably early March.	19	Q Okay. And then going back to Jaleel, did you have
20	Q And this was again in the shower?	20	any other conversations with him after the first
21	A Yes.	21	shower conversation?
22	Q And were there like 30 people there again?	22	A You said did I have any communication with Jaleel
23	A Correct.	23	after the first shower conversation?
24	Q And just describe this conversation for me. Who	24	Q Yeah.
25	started it, you or him?	25	A I didn't have any shower conversation with Jaleel. I
Page 51		Page 53	
1	A He did.	1	had the shower conversation with Titus.
2	Q What did he say?	2	Q Yeah, let me rephrase. After the first shower
3	A He waved me over. He was on the opposite end of the	3	conversation with Titus Henderson did you have any
4	shower room and I was on the other opposite end. He	4	conversations with Jaleel?
5	waved me down, asking me am I gonna pay that, and I	5	A No, I don't think so. To the best of my memory, no.
6	shook my head no, and that was it.	6	Q And after the first shower conversation with
7	Q All right. So he said, "Are you gonna pay that," you	7	Titus Henderson did you have any other conversations
8	shook your head, and then what happened, you walked	8	with somebody on his behalf?
9	away?	9	A Yes, I sent a letter to somebody, and they talked to
10	A Yeah. I wasn't close up on him. He was still from a	10	me about the letter after the stabbing incident
11	distance. I was walking towards him, but I was still	11	happened. This was after. Are you talking about
12	like a distance, and he asked me was I gonna pay	12	before the stabbing or after?
13	that, and I told him no.	13	Q So let's limit it to before the stabbing for now.
14	Q Is that what he said, "Are you gonna pay that?"	14	So between the conversation that you had with
15	A Yeah.	15	Mr. Henderson in late February of 2023 up through the
16	Q Or did he say something more specific?	16	stabbing in March of 2023, did you have any
17	A "Are you gonna pay that," from our prior	17	conversations with somebody on Mr. Henderson's
18	communication and from the prior communication with	18	behalf?
19	Jaleel, so he didn't have to say are you gonna pay	19	A No.
20	that money or are you gonna pay that whatever. I	20	Q Okay. So to sum up, the conversations that you'd
21	knew exactly what he was talking about.	21	had prior to the stabbing were approximately
22	Q So if you were across the room still, he must have	22	10 conversations with Jaleel and then two
23	called that out pretty loudly, right?	23	conversations with Mr. Henderson in the shower; is
24	A Right.	24	that a correct summary?
25	Q So probably some of the other 30 or so inmates would	25	A Correct.

<p style="text-align: right;">Page 54</p> <p>1 Q And there were no other conversations that you had 2 with Mr. Henderson or anybody on his behalf prior to 3 the stabbing? 4 A Correct. 5 Q Okay. Did you ever make any statement that you were 6 going to, quote, "Fuck up," Mr. Henderson? 7 A Say that again. 8 Q Did you ever make a statement that you were going to, 9 quote, "Fuck up," Mr. Henderson? 10 A When you say quote, who you quoting? 11 Q I'm quoting off of the criminal complaint that you 12 submitted with your Complaint. 13 A Oh, no. I thought you was saying -- I thought you 14 was quoting me. No, I didn't. I never said that. 15 Q Okay. Did you ever imply that you would fight 16 Mr. Henderson? 17 A Did I ever imply? No, no. 18 Q All right. Are you aware of whether Mr. Henderson 19 belongs to a gang or security threat group? 20 A No. 21 Q No, you're not aware or no, he doesn't? 22 A No, I'm not aware. 23 Q Regarding Mr. Henderson's threats towards you, did 24 you ever discuss those threats with any other 25 inmates?</p>	<p style="text-align: right;">Page 56</p> <p>1 only people I talked to was them three. Whether them 2 three had any discussions with other parties, I can't 3 tell you that. 4 Q But as far as you know, it was only those three? 5 A I don't know. That's what I'm saying. Yeah, as far 6 as I know, that's the only people I had a 7 conversation with. I can't tell you anything 8 regarding who Jaleel talked to, who Titus talked to, 9 who Dixon talked to. I can't testify to what 10 somebody else told somebody else. I wasn't there. 11 I wouldn't know. 12 Q I understand, but nobody other than those three ever 13 gave you reason to believe that they knew about the 14 threats; is that right? 15 A I don't know. I don't know what other people knew. 16 I don't know. 17 Q Okay. Are you familiar with the organization 18 Gangster Disciples? 19 A Yes. 20 Q What is it? 21 A It's what you just said. You asked me was I familiar 22 with the organization Gangster Disciples. It's an 23 organization. 24 Q What does the organization do? 25 A What you mean, what do they do?</p>
<p style="text-align: right;">Page 55</p> <p>1 A The only person I discussed the threat with was 2 Dixon. 3 Q All right. So -- 4 A Because Dixon came, came to me and notified me or 5 questioned me about the pictures, and I told her I 6 didn't have the pictures. There was a back and forth 7 about it, if I didn't turn the pictures over there 8 was gonna be an issue with Titus Henderson. So 9 outside of Jaleel and Titus Henderson the only other 10 person who I had a conversation with about a threat 11 against me is Dixon. 12 Q Did you ever discuss it with anybody outside of the 13 institution? 14 A No. 15 Q So in terms of the threats that Mr. Titus or that 16 Mr. Henderson was making against you, the only three 17 people who knew about them were Mr. Henderson, Jaleel 18 and Ms. Dixon; is that your testimony? 19 A You say -- ask that question again. You said is it 20 my testimony -- 21 Q Yeah? 22 A -- that only them knew about it. 23 Q Right. 24 A I don't know. I can't tell you who they spoke to. 25 You asked me if I talked to somebody about it. The</p>	<p style="text-align: right;">Page 57</p> <p>1 Q Well, organizations generally have a purpose. What's 2 the purpose of the Gangster Disciples? 3 A I don't know, it depends. Growth and development, I 4 guess you could say. That's the purpose. 5 Q Would you characterize it as a gang? 6 A I think gang is a broad term. Who gets to determine 7 who can have that title versus groups, social groups, 8 organizations? Like it has a negative stereotype to 9 it to designate a group of people as a gang versus a 10 social group or something like that, so it all 11 depends on who is using the term, I guess. 12 Q What are some of the activities that the organization 13 generally carried out? 14 MR. PRUDE: Objection, relevance. 15 That's not relevant to -- I didn't get assaulted 16 by GDs. I got assaulted by Titus, Dixon and 17 Jaleel. That's who I got assaulted by. 18 MR. DAVIES: Your objection is noted, 19 but can you answer the question or are you 20 refusing to answer? 21 MR. PRUDE: Why do you keep asking me 22 that? I just told you when I object, I know 23 what it means. So you ain't gotta keep asking 24 me, because when you ask that question, it gives 25 the impression like I'm being -- like I'm</p>

Page 58		Page 60	
1	refusing something, after I've already had this	1	Q You can't tell me because you don't know?
2	conversation with you.	2	A I can't tell you because I don't know.
3	So for the record, I just object.	3	Q So you don't know if Titus Henderson was ever a
4	When I object, that means you can ask the	4	member of Gangster Disciples?
5	question again.	5	A I don't know.
6	Q Okay, I'll ask the question again. What are some of	6	Q What was your role in the organization?
7	the activities that the organization Gangster	7	A I was a member.
8	Disciples generally carry out?	8	Q Did you have any title or leadership position?
9	A Some people say they engage in criminal activities.	9	A I probably did. I think you could find those
10	I never engaged in criminal activity as a Gangster	10	documents out in the record. Prison officials have
11	Disciple when I was, so I can't speak upon what other	11	accused me of having positions, in disciplinary
12	people may do, but me, I never engaged in any	12	hearings, yes.
13	criminal activity with my affiliation.	13	Q What was your title or your leadership position?
14	But, yeah, does criminal activity happen? Yes,	14	A The prison officials determined that my title was
15	it does happen. I don't think that's exclusive to	15	institution coordinator in conduct reports that I
16	Gangster Disciples. Muslims commit crimes.	16	went to disciplinary hearings on.
17	Christians commit crimes. Catholics commit crimes.	17	Q Has Gangster Disciples ever organized to attack
18	So I don't think it's tailored to just whether or not	18	another inmate?
19	Gangster Disciples commit crimes. People commit	19	A Has Gangster Disciples ever what?
20	crimes.	20	Q Organized to attack another inmate?
21	Q What are some of the crimes that you are aware	21	A I don't know. I can't tell you. I haven't. I can't
22	Gangster Disciples have carried out?	22	tell you what somebody else did.
23	A The same crimes that everybody carries out. It's not	23	Q Does Gangster Disciples have any feuds with other
24	exclusive to Gangster Disciples, though. I'm aware	24	gangs?
25	that people in general carry out all types of crimes.	25	A Probably.
Page 59		Page 61	
1	People sell drugs. People do all type of stuff.	1	Q Which gangs?
2	Q Were you ever a member of Gangster Disciples?	2	A It all depends. It ain't one specific. It all
3	A Yes.	3	depends.
4	Q When?	4	Q Did you ever discuss gang membership with Titus
5	A It ended in 2020.	5	Henderson?
6	Q When did it begin?	6	A No.
7	MR. PRUDE: Is this -- is this about	7	MR. DAVIES: All right. Let's take a
8	my gang affiliations or about what happened in	8	break for 10 minutes and then come back.
9	the case?	9	(A recess is taken)
10	MR. DAVIES: If you want to state an	10	(2:39 p.m. to 2:49 p.m.)
11	objection, you can do that.	11	EXAMINATION (RESUMED)
12	MR. PRUDE: Yeah, because you can't	12	BY MR. DAVIES:
13	just use this deposition to launch a bunch of	13	Q Okay. We're back, Mr. Prude. Let's talk about your
14	questions about something that's not relevant.	14	conversations and your history with the defendant in
15	Like I get what you're trying to do. It's the	15	this case, Ms. Dixon. When did you first meet
16	same thing you did with the other lawsuit, so I	16	Ms. Dixon?
17	get what you're trying to do. Like it's not	17	A I first -- I think I first saw her in 2021, I
18	lost on me what game you're playing or what game	18	believe, or 2020. I think it was 2020 I believe I
19	you're planning here, but go ahead.	19	first saw her, I believe.
20	Q All right. So from when to when were you affiliated	20	Q And in what context did you first meet her?
21	with Gangster Disciples?	21	A I just saw her. She's a correctional officer, so I
22	A From the nineties to 2020.	22	just seen her in passing, transporting inmates,
23	Q Was Titus Henderson ever a member of Gangster	23	walking past, doing showers, doing supplies, just in
24	Disciples?	24	passing.
25	A I can't tell you.	25	Q Okay.

<p style="text-align: right;">Page 62</p> <p>1 A She was a black -- she was black, so being a black 2 correctional officer, it's rare to see them in any of 3 these institutions. They're predominantly white, so 4 she stood out. 5 Q What is the first conversation you ever remember 6 having with Ms. Dixon? 7 A In 2022, about the pictures. 8 Q Okay. So prior to 2022 you had never spoken to her 9 before? 10 A No. Well, yeah, I mean, she would say, "Hey, how you 11 doing," in passing and just nod, head nods and things 12 like that, but no, we never had a conversation. 13 Q Okay, all right. So 2022 was your first real 14 conversation with her. And I guess backing up again, 15 did you ever exchange any written correspondence with 16 her prior to 2022? 17 A With who, Dixon? 18 Q Yeah. 19 A No. What you mean, like what you mean, 20 correspondences? 21 Q Well, if you had ever written to her, had somebody on 22 the outside exchange messages, any sort of 23 communication with her, direct or indirect? 24 A No, not me, no. 25 Q I'm sorry. You broke up there for a second. Can you</p>	<p style="text-align: right;">Page 64</p> <p>1 that, but I believe I was in the North Cell Hall 2 then. 3 Q Okay. So if she came to you, so what time of day was 4 it? 5 A I don't know, man. It was daytime. It was daytime, 6 light was outside. 7 Q And do you remember specifically when in December it 8 was, early December, late December, around Christmas, 9 any idea? 10 A It was in December. 11 Q But you don't remember when in December? 12 A Exact date, no. I know it was in December, before -- 13 it was before the New Year's, before January 1st, so 14 sometime in December. 15 Q Do you remember if it was before Christmas? 16 A It could have been. I'm not sure. I know it was in 17 December. I didn't -- it was in December. 18 Q All right. So going back to the time of day, you 19 don't remember exactly. Do you remember if it was 20 before or after lunch? 21 A You're breaking up. Say that again. 22 Q Going back to the time of day, I know you said you 23 don't remember exactly. Do you remember if it was 24 before or after lunch? 25 A I'm not sure. It was during the daytime. I</p>
<p style="text-align: right;">Page 63</p> <p>1 repeat that answer? 2 A I said no, not me. No, I've never, not me, no. 3 Q Okay, all right. So let's talk about 2022 then. 4 What was the first interaction with her that you 5 remember in 2022? 6 A When she came to me and told me that she was aware 7 somebody was supposed to be stabbing me or doing 8 something to me, and I told her or asked her, "Who 9 you talking about?" And she said Titus Henderson. 10 Q When was this conversation? 11 A Let's say December, December of 2022. 12 Q So this was a month or two after your last 13 conversation with Jaleel; is that right? 14 A Correct. 15 Q Okay. So December of 2022, where were you when this 16 conversation happened? Was it in your cell? 17 A Yes. 18 Q Where were you housed at that time? 19 A In 2022, I don't remember. I don't know if I was 20 in the North or the South. I can't remember. I 21 was in one of the cell halls in Green Bay. I can't 22 remember which one, but I was in both of those cell 23 halls, because not soon after I was -- I got moved 24 to the South, so I'm not sure. It was probably 25 the North. I don't want to be definitive about</p>	<p style="text-align: right;">Page 65</p> <p>1 don't -- I don't remember if it was -- I know it 2 was after breakfast. I can tell you that. It was 3 after breakfast, before dinner, so sometime between 4 breakfast and dinner. 5 Q Was anybody else present that would have heard the 6 conversation? 7 A No, not with her, no, not when she came to my cell, 8 ain't nobody else present then. 9 Q Was she wearing a body camera? 10 A Say that again. 11 Q Was she wearing a body camera? 12 A I'm not sure. 13 Q All right. So she came to your cell. Who started 14 the conversation, you or she? 15 A She did. 16 Q What did she say? 17 A "Be honest about the pictures." She told me to be 18 honest about the pictures, do I have them, and I told 19 her, "I don't have them." 20 Q All right. And what did she say next? 21 A "Everybody is saying you got them. If I search 22 your cell, would I find the pictures?" I told her, 23 "If you search my cell, you ain't gonna find no 24 pictures." 25 Q Did she say who specifically had said you had the</p>

Page 66

1 pictures?

2 A She said they said I had the pictures, they. I took

3 they to mean Titus and Jaleel.

4 Q Did you ask her who they meant?

5 A No. I think it was pretty clear from everything that

6 was going on. There was no reason -- I think this is

7 important. There was no reason for her to believe I

8 had the pictures unless they told her, because prior

9 to this the only people I had conversations about

10 whether or not they thought I had some pictures was

11 Titus and Jaleel.

12 So for her to come to my cell with these

13 allegations, I knew that they had to have had a

14 conversation with her. Otherwise, it would be no

15 reason for her to just pop up at my cell asking me do

16 I have some pictures of her. There would be no

17 reason for that. So when she said they was saying

18 that, I took that to mean the people that came and

19 talked to me previously.

20 Q Okay. So she said, "They say you have the pictures,"

21 you said you didn't have them, and then she said she

22 was going to search your cell, you said that she

23 wasn't going to find pictures in your cell. What did

24 she say then?

25 A Would she find any porn in my cell. I told her,

Page 67

1 "You probably will find porn in my cell, but none of

2 you."

3 Q Okay. And what did she say next?

4 A She kind of walked off, said she'll be back.

5 Q And did you say anything else?

6 A No. She walked off, said she'll be back.

7 Q Okay. So that was the end of that conversation,

8 correct?

9 A Correct.

10 Q All right. When was your next interaction with

11 Dixon?

12 A Probably -- I don't know if it was later on that day

13 or the next day, maybe the next day.

14 Q Okay. And how did that -- how did that conversation

15 start?

16 A She told me that she heard that Titus Henderson was

17 supposed to be doing something to me, that somebody

18 was supposed to be stabbing me, and I said, "What

19 inmate is supposed to be doing something to me?"

20 And she mentioned Titus Henderson. And that was the

21 second communication.

22 Q Was this at your cell again?

23 A Yes.

24 Q Was there anybody around that would have heard it?

25 A Was't nobody at my cell. I can't tell you whether

Page 68

1 there was somebody standing outside the door

2 listening, or I don't know. I was in my cell, so I

3 can't tell you, but wasn't nobody standing at my door

4 with her.

5 Q So for both of these conversations she was standing

6 outside your cell and you were in your cell; is that

7 right?

8 A Correct.

9 Q All right. And again, do you remember what time of

10 day this was?

11 A It was during the daytime, regular hours. It was

12 after breakfast, before dinnertime, sometime like

13 that, maybe before 6, between -- maybe before -- I

14 want to say maybe before 6, 6 p.m., sometime between

15 that time period in the morning time after breakfast

16 and 6 p.m., sometime like that, I guess. That's just

17 approximately. Like I don't know.

18 Q I understand.

19 A That's approximate.

20 Q Did you notice if she was wearing a body camera

21 during that second conversation?

22 A No.

23 Q All right. So what did you --

24 A Me, personally, I don't believe she did. If she had

25 one on, I don't think she turned it on, because she

Page 69

1 would be recording her own illegal conduct if she

2 turned it on, so I don't believe that she was

3 recording anything that can be even remotely

4 recording her having these conversations.

5 If she did, then I would like to request copies

6 of those records if you have them. But I doubt it,

7 that she would record herself, especially since she

8 didn't have access to what was being recorded. Once

9 she pressed -- I'm aware that guards press the button

10 on their little thing, but to my knowledge, the only

11 people who wore body cameras -- I could be wrong --

12 is people who worked in Segregation. People in

13 General Population didn't wear body cameras.

14 Q And where were you at this time, in Segregation?

15 A Say that again.

16 Q And where were you at this time, in Segregation or in

17 General Population?

18 A I was in General Population.

19 Q All right. So what else did she say?

20 A The second time?

21 Q Yeah.

22 A Like I said, man, it was inquiring about -- the first

23 time, inquiring about the pictures. The second time,

24 telling me about the threat. I told her or I asked

25 her the name of the individual who's supposed to have

Page 70		Page 72	
1	been doing the stabbing or doing something to me, and	1	Q When was that?
2	she told me Titus Henderson. She told me that she	2	A Probably a couple days after the last interaction.
3	was going to notify somebody in Security about it,	3	She came to my cell three times total, so it was
4	but I don't think it was genuine, but that's what she	4	three incidents, the first two and then the third
5	indicated.	5	time.
6	Q Okay. So I want to pin down exactly what she said.	6	Q Okay. And do you remember the time of day for the
7	So do you remember any details of how she worded	7	third time?
8	things, or are you just paraphrasing what she said?	8	A The same time of day.
9	A When she came to my cell, she indicated that she	9	Q And again, was there anybody that would have
10	heard that somebody was supposed to be doing	10	overheard it that you know of?
11	something to me. I asked her who is supposed to be	11	A I'm not sure.
12	doing something to me. She told me she heard that an	12	Q All right. So describe the third conversation for
13	inmate is supposed to be attacking me based off the	13	me. What did she say?
14	photos of her, if I wouldn't turn them over or pay	14	A She came to my cell. She handed me a piece of
15	for the cost of the photos. I told her I didn't have	15	paper that had Candy, a cash app on it, that had,
16	the photos and I'm not paying nothing for no photos	16	"My cash app," written on it. It either said
17	that I didn't have.	17	Candy Bangs or Candyland as a cash app on it, telling
18	She said, "Well, I will notify Security about	18	me to wire, have my people or somebody send \$2,000 to
19	the threat to your safety." Like I said, I don't	19	that cash app if I wanted to avoid the assault.
20	think she was being genuine about it. She would have	20	Q Do you have a cash app account?
21	no reason, in my mind, to report herself, because if	21	A Say it again. Do I have it?
22	they learned that this whole thing is about pictures	22	Q Do you have a cash app account?
23	of her, I don't think she -- that's why I didn't take	23	A No, I don't.
24	it serious. I didn't take it as a real comment that	24	Q Okay. So she wanted you to tell somebody on the
25	she would report that somebody is supposed to be	25	outside to wire it for you?

Page 71		Page 73	
1	doing something to me, because I'm thinking if she	1	A Correct.
2	did, like I said, they would investigate why it was	2	Q Okay. And I'm sorry, can you say it again? How much
3	gonna happen, what was it about, and then it would	3	did she say she wanted?
4	come out it was about some pictures of her naked, so	4	A \$2,000.
5	I don't believe that. I didn't take it serious, her	5	Q And this was in exchange for what?
6	saying she'd report it.	6	A For either me keeping the pictures that they thought
7	Q Do you remember anything else that she said to you	7	I had or the price of the pictures and to avoid the
8	during this conversation?	8	assault. Like I said, from the first time she came
9	A Just that she was gonna report it to Security, the	9	to my cell, it was about the pictures. The second
10	security director, and then that was the end of that	10	time it was about the pictures.
11	conversation. She left.	11	Now, all of a sudden it's a threat against me,
12	Q Did she use Titus Henderson's name, or did she just	12	and now all of a sudden it's if I want to avoid the
13	say an inmate?	13	threat I gotta pay this, and it all derives from the
14	A She used Titus Henderson.	14	pictures. But the third time at my door she made it
15	Q Okay. Did she say who she would report it to in	15	clear that it was to avoid the assault, but the
16	Security?	16	assault derived from the pictures, so it wasn't just
17	A Security director.	17	an assault. It was the pictures that triggered all
18	Q Did she specifically say she was going to report it	18	of this. But, yeah, the third time at my cell was
19	to the security director or did you assume that's who	19	about paying the fee to avoid the assault.
20	she meant?	20	Q So did she specifically say that if you didn't pay
21	A She said director director.	21	you were going to be assaulted?
22	Q Okay, all right. After that second conversation did	22	A Yeah, she said to avoid the assault, and she gave me
23	you have any more interactions with Dixon?	23	her cash app, yeah. And then when I told her I'm
24	A Yes, I had a third conversation with Dixon where she	24	not paying nothing, she walked away and said,
25	came back again and gave me -- oh, go ahead.	25	"Your funeral."

<p style="text-align: right;">Page 74</p> <p>1 Q Did she say who was going to assault you?</p> <p>2 A She already told me who was going to assault me. She</p> <p>3 told me Titus Henderson.</p> <p>4 Q Based on the second conversation, so not during this</p> <p>5 third conversation; is that right?</p> <p>6 A It was the understanding that it was the same person.</p> <p>7 She had already told me that she got word from</p> <p>8 somebody. I don't know how, but I'm assuming she</p> <p>9 talked to them directly, seeing that she even knew</p> <p>10 that they talked to me about the pictures of her, so</p> <p>11 I assumed that they talked to her about it, like I</p> <p>12 said, for her to even come to my cell.</p> <p>13 So the second time is when she told me about</p> <p>14 Titus Henderson and that she would tell Security and</p> <p>15 all of this that they're supposed to be stabbing me.</p> <p>16 And then the third time when she said if I wanted to</p> <p>17 avoid that stabbing, she was referring to what the</p> <p>18 threat already was that she notified me of. If I</p> <p>19 wanted to avoid that assault that she told me on the</p> <p>20 second interaction, that's what she was referring to.</p> <p>21 Q So when she told you that, when she gave you the</p> <p>22 cash app information and told you to either pay</p> <p>23 \$2,000 or be assaulted, what did you say?</p> <p>24 A I said, "I'm not paying shit." As a matter of</p> <p>25 fact --</p>	<p style="text-align: right;">Page 76</p> <p>1 Q All right. Who is Greg? Do you know his last name?</p> <p>2 A No, I don't.</p> <p>3 Q Do you know his nickname?</p> <p>4 A We call him Greg. That's what we call him, Greg,</p> <p>5 G-r-e-g.</p> <p>6 Q Do you know if that was his real name or his</p> <p>7 nickname?</p> <p>8 A I just said I didn't know. We call him Greg.</p> <p>9 Q Okay. How do you know Greg?</p> <p>10 A He was in the same cell hall with me. I worked out</p> <p>11 with him, I exercised with him.</p> <p>12 Q Is he still in the same institution with you?</p> <p>13 A Say that again.</p> <p>14 Q Is he currently at the same institution as you?</p> <p>15 A No. At this institution? No, he ain't. He was in</p> <p>16 Green Bay. He's not incarcerated in Boscobel.</p> <p>17 Q Okay. So what did you say to Greg about these</p> <p>18 conversations?</p> <p>19 A I just explained to him what happened, the situation</p> <p>20 with the porn, the situation with Jaleel, the</p> <p>21 situation with Dixon, the situation with Titus, just</p> <p>22 explained the whole ordeal about what happened.</p> <p>23 Q And what did Greg say to you?</p> <p>24 A Just telling me, "That's fucked up." This was after</p> <p>25 the assault. This wasn't prior to. This was after</p>
<p style="text-align: right;">Page 75</p> <p>1 Q Did she say anything else after that?</p> <p>2 A Yeah, she walked away and said, "Your funeral."</p> <p>3 Q Did you say anything else after that?</p> <p>4 A No, I didn't.</p> <p>5 Q Do you remember any other details about that</p> <p>6 conversation?</p> <p>7 A That was the conversation.</p> <p>8 Q Okay. After that third conversation at your cell did</p> <p>9 you have any other interactions with Dixon?</p> <p>10 A No.</p> <p>11 Q Did you exchange any written communications with her?</p> <p>12 A No.</p> <p>13 Q Did you direct anybody to communicate with her?</p> <p>14 A No.</p> <p>15 Q Did you exchange any electronic communications with</p> <p>16 her or direct anybody to?</p> <p>17 A No.</p> <p>18 Q All right. So after these three conversations with</p> <p>19 Dixon did you report those conversations to anybody</p> <p>20 else?</p> <p>21 A What, inmates or just anybody?</p> <p>22 Q We'll start with inmates and then move on. So did</p> <p>23 you talk about that with any other inmates?</p> <p>24 A I may have. I think I did with a guy named Greg.</p> <p>25 Yeah, with a guy name Greg, yeah, I did.</p>	<p style="text-align: right;">Page 77</p> <p>1 it had already happened.</p> <p>2 Q All right. So between those conversations with Dixon</p> <p>3 and the assault, did you talk about those</p> <p>4 conversations with any other inmates?</p> <p>5 A Can you repeat that?</p> <p>6 Q Yeah. Between your conversations with Dixon and the</p> <p>7 assault in March, did you talk about the</p> <p>8 conversations with anybody, with any other inmates?</p> <p>9 A No.</p> <p>10 Q All right. And during that same time period -- so in</p> <p>11 the next few questions I'm going to be asking you</p> <p>12 about the time from your last conversation with Dixon</p> <p>13 to the assault in March. During that time did you</p> <p>14 talk about the conversations with Dixon with any</p> <p>15 other prison staff members?</p> <p>16 A No. And I think the reason I didn't is because,</p> <p>17 you know, at that time it was a lot of stuff going on</p> <p>18 in Green Bay. There was a lot of staff who was</p> <p>19 engaged in all types of conduct, so I -- no, I</p> <p>20 didn't. I didn't feel the need to report it to</p> <p>21 people who could be as corrupt as her, so no, I</p> <p>22 didn't report it.</p> <p>23 Q So you didn't report it because you thought that</p> <p>24 other prison staff might be corrupt; is that a fair</p> <p>25 summary of what you just said?</p>

Page 78		Page 80	
1	A Correct.	1	indicted for bringing in drugs, staff is engaging in
2	Q Did you discuss your conversations with Dixon with	2	all types of misconduct, so I didn't feel even
3	anybody outside of the institution?	3	comfortable reporting it to anybody.
4	A Yes.	4	Q All right. So you said that some of the white shirts
5	Q Who?	5	had said that corrections staff were smuggling in
6	A Family. Well, I won't say outside of the	6	contraband. Why would -- why did you not report
7	institution. I had a conversation when they came to	7	these conversations to a white shirt?
8	visit me, and I told them what happened to me. So,	8	A You said why didn't I report these conversations to a
9	yeah, I wouldn't classify it as outside the	9	white shirt?
10	institution, seeing as it was a visit that happened	10	Q Yeah.
11	inside the institution, if you get what I mean.	11	A Report which conversations to a white shirt?
12	Q I understand. So when I say outside of the	12	Q Your conversations with Dixon.
13	institution, I mean to somebody that's not an inmate	13	A Why?
14	or a prison staff member. So you said that you	14	Q Yeah.
15	discussed this with family. Which family members did	15	A I just -- I just told you why.
16	you discuss this with?	16	Q So you felt that the white shirts were corrupt as
17	A Cousins, friends. It was more about people wondering	17	well as the lower level COs?
18	why I got stabbed. It was more of a family concern.	18	A I didn't know who were not corrupt.
19	It wasn't me trying to -- they was just wondering.	19	Q Did you have any reason to think that the security
20	They heard I got stabbed, so family was concerned,	20	director was corrupt?
21	friends was concerned, so it was that nature of a	21	A Do I have any reason to believe it? Yeah. Yeah,
22	communication.	22	I have a reason to believe it, yeah. I done seen
23	Q So these communications all happened after the	23	him do a lot of stuff that's corrupt, not to the
24	stabbing. Did you tell anybody before the stabbing	24	extent of bringing in drugs or anything like that,
25	about the conversations with Dixon?	25	but I done seen him do other things and basically
Page 79		Page 81	
1	A No.	1	middle finger their own policies that requires them
2	Q Okay. So let's go back to this topic of believing	2	to act in a certain way or even say that the policies
3	that prison staff were corrupt. So you testified	3	don't apply to them, they apply to us. So, yeah, I
4	that you believe staff were corrupt like Dixon. Why	4	done seen them engage in certain conduct that made me
5	did you think prison staff were corrupt?	5	not trust in telling them anything.
6	A For one, multiple staff had got, I guess, terminated	6	Q So in other words, you thought it would be futile to
7	for bringing in drugs to inmates. Even some of the	7	even report your conversations with Dixon to the
8	white shirts were saying that they believed that	8	prison administration?
9	correctional officers was bringing in drugs for	9	A Did I think it would be futile to do so?
10	inmates. So you had supervisors -- white shirts we	10	Q Yeah.
11	call them. Supervisors was outlining that the only	11	A To those in the immediate prison, yeah, I believed it
12	way the drugs can be getting in here is through	12	would have been futile to do that, seeing as I didn't
13	staff, and then you got staff getting walked out	13	know who to trust, because I can report her to
14	because they're bringing in drugs.	14	somebody and that person can be working with her, and
15	You got staff -- like it was a former officer	15	it would be harder on me. So if I don't know who to
16	named Maher, M-a-h-e-r. He got walked out for	16	trust -- now, it's one thing if an inmate is
17	bringing in drugs in cell halls to inmates around the	17	threatening me. Then, yeah, I can go to a guard and
18	same time. So I've seen, especially in Green Bay,	18	report it.
19	where there was a real drug smuggling campaign where	19	But if I have a guard that's helping facilitate
20	guards were bringing it in.	20	a threat against me, you know, that probably deterred
21	So I didn't believe that I should go and report	21	me from wondering like or it deterred me from
22	staff misconduct to another staff who may also be in	22	wondering who else could be involved in this,
23	engaged in staff misconduct. So when I say that's	23	especially seeing that I'm aware that other guards
24	why I didn't report it, I didn't know who to trust	24	engaged in bringing drugs in, bringing weapons in,
25	based off of me seeing everybody either getting	25	and sometimes it will be three, four guards who are

<p style="text-align: right;">Page 82</p> <p>1 doing it together. So whether or not that can be</p> <p>2 security directors or supervisors or captains, I</p> <p>3 don't know. Like I don't put it past nobody, seeing</p> <p>4 what happened to me.</p> <p>5 Q Okay. So you didn't have concerns about reporting</p> <p>6 threats from other inmates, but it was threats by a</p> <p>7 prison guard that you were concerned about reporting;</p> <p>8 is that what you're saying?</p> <p>9 A No, that's not what I'm saying. It was all in one.</p> <p>10 It wasn't just a separate threat against an inmate.</p> <p>11 A guard was involved in the threat against me. So I</p> <p>12 get what you're trying to do, but you can't separate</p> <p>13 Dixon from the inmates, because she was pushing their</p> <p>14 agenda by trying to get me to pay, so it wasn't</p> <p>15 just -- if I'm reporting them, I'm reporting her. If</p> <p>16 I'm reporting her, I'm reporting them. There was no</p> <p>17 distinguishment between them and her and her and</p> <p>18 them.</p> <p>19 Q Did anyone ever tell you -- other than</p> <p>20 Titus Henderson, I suppose, did anybody ever tell</p> <p>21 you that Dixon had inappropriate relationships with</p> <p>22 other inmates?</p> <p>23 A Yes.</p> <p>24 Q Who?</p> <p>25 A Jaleel.</p>	<p style="text-align: right;">Page 84</p> <p>1 markings from the ones with her face of the ones when</p> <p>2 you compare it to the ones without her face.</p> <p>3 So everybody knew that she was the selling</p> <p>4 pictures not directly to the inmates, but she was</p> <p>5 using certain inmates, I guess like running a porn</p> <p>6 ring, I guess you could say, where she was providing</p> <p>7 the porn pictures, giving it to inmates, certain</p> <p>8 inmates, and inmates were selling them to other</p> <p>9 inmates. And depending on who you was, you might get</p> <p>10 a picture that was without her face. In other</p> <p>11 situations if you were cool and they trusted you, you</p> <p>12 could probably get pictures of her with her face.</p> <p>13 So and then you could have other pictures where</p> <p>14 there was a masquerade mask, I'm told, where it's</p> <p>15 just a mask over her, like a Mardi Gras mask that</p> <p>16 just covered the eyes where I guess that was her way</p> <p>17 of trying to disguise herself that way. So, yeah, it</p> <p>18 was -- it was well known. It wasn't secret.</p> <p>19 And I think what solidified it for me is when</p> <p>20 they came to me, when Jaleel came to me about the</p> <p>21 pictures. That's where it went from just rumor to</p> <p>22 actually then a reality, when they brought it to my</p> <p>23 attention that that's -- I guess Titus Henderson was</p> <p>24 messing with her, and that was their girl. She</p> <p>25 belonged to them, I guess. She was taking pictures,</p>
<p style="text-align: right;">Page 83</p> <p>1 Q Okay. Other than Jaleel, did anybody ever tell you</p> <p>2 that Dixon had inappropriate relationships with other</p> <p>3 inmates?</p> <p>4 A Yes.</p> <p>5 Q Who?</p> <p>6 A It was a -- it was -- like I don't even think it was</p> <p>7 a secret that she was selling porn pictures of</p> <p>8 herself to inmates. She would give them to certain</p> <p>9 inmates, to help them gain money for herself. Like</p> <p>10 the ones that -- like they would give specific</p> <p>11 pictures out to certain inmates who they didn't</p> <p>12 believe would report her, and those pictures would</p> <p>13 include like pictures of her face.</p> <p>14 Other pictures would be like from TextBehind</p> <p>15 where -- well, I'm assuming it's from TextBehind,</p> <p>16 because I done received TextBehind pictures from</p> <p>17 family and friends and it was the same paper format,</p> <p>18 where on the pictures you can that it's just</p> <p>19 different photographs of different areas of the body.</p> <p>20 And they would sell those to inmates.</p> <p>21 Many inmates had photos where the face was</p> <p>22 cropped out in the picture, and it was different</p> <p>23 pictures, and people were saying that that was Dixon.</p> <p>24 And if you compare the pictures of her face with the</p> <p>25 ones without her face, you can see some of the same</p>	<p style="text-align: right;">Page 85</p> <p>1 giving them to them, and they was selling them.</p> <p>2 Q Have you ever seen a pornographic picture of Dixon?</p> <p>3 A No. I had people describe them in detail to me, but</p> <p>4 I've never actually physically seen a picture with my</p> <p>5 own eyes myself. And if I did, it had to have been a</p> <p>6 picture with her cropped out. I've never seen a</p> <p>7 picture with her face in it, so no. No, I haven't.</p> <p>8 Q Do you recall any specific names of people who told</p> <p>9 you that they had pornographic pictures of Dixon?</p> <p>10 A Jaleel. Jaleel himself told me that him and Titus</p> <p>11 had pictures of her and that they sell pictures of</p> <p>12 her. That's how I know about the pictures being sold</p> <p>13 by like -- depending on who they are, like if they</p> <p>14 don't know you but you're looking for some porn,</p> <p>15 they'll give you a picture of her with her head</p> <p>16 cropped out of the picture where it just be her body</p> <p>17 parts. If they know you, you can get a picture of</p> <p>18 her with her face in it.</p> <p>19 Q When you said they, do you mean Titus Henderson and</p> <p>20 Jaleel?</p> <p>21 A Correct. They were the ones that were pushing the</p> <p>22 pictures.</p> <p>23 Q Besides --</p> <p>24 A Huh?</p> <p>25 Q Besides Jaleel, did anybody ever tell you that they</p>

<p style="text-align: right;">Page 86</p> <p>1 had a pornographic picture of Dixon?</p> <p>2 A Yes, other inmates talked about they seen them</p> <p>3 before, they seen pictures of her before. But like</p> <p>4 people have over-the-tier conversations. People -- I</p> <p>5 heard inmates say, "Hey, man, I done seen the picture</p> <p>6 too where she had this on," describing certain things</p> <p>7 she had on and what she was doing. And I heard</p> <p>8 inmates over the range talking about it, but I</p> <p>9 thought it was just a bunch of bullshit. I didn't</p> <p>10 know that it was actually true. I thought inmates</p> <p>11 were just saying something, but it turned out to be</p> <p>12 true.</p> <p>13 Q Well, but you don't know if it was true, right,</p> <p>14 because you never saw a picture of Dixon?</p> <p>15 A Me, myself?</p> <p>16 Q Right.</p> <p>17 A No, I never. I don't know if it's true, but I don't</p> <p>18 think somebody would come and -- I'm gonna say this.</p> <p>19 I didn't see the pictures myself, but I believe they</p> <p>20 existed, seeing what Jaleel said, seeing the message</p> <p>21 I was getting from Titus about it and what Dixon</p> <p>22 herself said. So I believe the pictures existed.</p> <p>23 They just had the wrong person who they thought had</p> <p>24 them. I didn't have them, but 100 percent I believe</p> <p>25 that they existed.</p>	<p style="text-align: right;">Page 88</p> <p>1 probably say, "Oh, that's my guy talking." But if</p> <p>2 you don't the individual, you don't know who's</p> <p>3 talking.</p> <p>4 So when I say I heard people over the range say,</p> <p>5 "Hey, man, I seen the picture, I seen those pictures</p> <p>6 before," that's me just telling you what I've heard</p> <p>7 other inmates say. I don't know the identity of the</p> <p>8 inmate.</p> <p>9 Q Did you recognize anybody's voice that said that?</p> <p>10 A No. If I did, I would have just gave you his name.</p> <p>11 But no, I don't know his name. I heard the</p> <p>12 conversation. I heard the inmate say, "They're not</p> <p>13 lying about that. I seen the pictures myself too."</p> <p>14 So like I said, up to that point, that was when</p> <p>15 it was just a rumor about whether or not that even</p> <p>16 existed. Like I said, it became more real for me</p> <p>17 when Jaleel and Titus and Dixon herself came to me</p> <p>18 like confronting me about the pictures. That's when</p> <p>19 it became more real to me that these pictures exist</p> <p>20 and they're of her, so much so that she threatened to</p> <p>21 search my cell to get them back, thinking I had them.</p> <p>22 Q Did she ever search your cell?</p> <p>23 A No, she didn't.</p> <p>24 Q Did anybody ever tell you that Dixon had smuggled in</p> <p>25 contraband?</p>
<p style="text-align: right;">Page 87</p> <p>1 Q All right. So I'm trying to pin down the specific</p> <p>2 people that told you about pictures other than</p> <p>3 Jaleel. So do you remember the name of anybody else</p> <p>4 who told you that they had a picture of Dixon?</p> <p>5 A No, I don't remember people saying they had a</p> <p>6 picture. I remember people saying they seen the</p> <p>7 pictures. Like I said, I -- have you ever been in</p> <p>8 Green Bay Correctional Institution?</p> <p>9 Q I have not.</p> <p>10 A Well, if you ever get a chance, you would see how</p> <p>11 inmates talk over ranges. It's four ranges. It's</p> <p>12 like stacked on top of each other. It's four of</p> <p>13 them. So you might be just standing at the door, and</p> <p>14 you just hear people talking, you hear voices, you</p> <p>15 hear sounds. It's a loud environment where you don't</p> <p>16 know who is who.</p> <p>17 So when you're asking me to specify certain</p> <p>18 prisoners who said this and who did this, that's</p> <p>19 impossible under the circumstances. Like unless</p> <p>20 you've actually visited Green Bay, you would</p> <p>21 understand why I keep telling you I don't know the</p> <p>22 name of these inmates, I heard this, I heard that.</p> <p>23 It's because of the way the ranges is set up, you</p> <p>24 would never know who's saying what unless you know</p> <p>25 them and you recognize their voice. Then you can</p>	<p style="text-align: right;">Page 89</p> <p>1 A Yes.</p> <p>2 Q Who told you that?</p> <p>3 A Jaleel.</p> <p>4 Q I'm sorry? Say that again.</p> <p>5 A Jaleel.</p> <p>6 Q Besides Jaleel, did anybody tell you that she had</p> <p>7 smuggled in contraband?</p> <p>8 A Yes, it was -- like I said, it's a culture of</p> <p>9 everybody knows a lot regarding correctional officers</p> <p>10 doing something. It seemed like that seemed to be</p> <p>11 one of the hardest things inmates don't know how to</p> <p>12 keep to themselves. When it's a guard engaged in</p> <p>13 bringing in drugs, it's like everyone notifies</p> <p>14 everybody that they got a special type of smuggling</p> <p>15 person.</p> <p>16 You know, it's one thing for inmates to smuggle</p> <p>17 it in themselves, but when inmates got a guard that's</p> <p>18 doing it, like that's big news. So, yeah, it was big</p> <p>19 news that Dixon was smuggling in drugs, marijuana and</p> <p>20 porn. And that she had a sexual relationship with</p> <p>21 Titus and Jaleel, that was going around too.</p> <p>22 Q All right. So in terms of the contraband you said</p> <p>23 she was supposedly smuggling in, you said marijuana,</p> <p>24 porn. When you say porn, do you mean the pictures of</p> <p>25 herself?</p>

Page 90		Page 92	
1	A Yes.	1	him that she believed that my safety was -- this is
2	Q Okay. Besides the marijuana and the pictures, did	2	what she told me. She said she emailed the security
3	anybody say that she was smuggling in anything else?	3	director and told him that -- this was after I got
4	A Cell phones, her smuggling in a cell phone and was	4	stabbed, and told him that she believed or that she's
5	communicating with inmates. Some people even say	5	concerned for my safety, not just against inmates,
6	that some people had her own personal phone number or	6	she's concerned about my safety as it relates to
7	her -- either her phone number or her email. They	7	staff, and she was requesting that I be transferred
8	said that she was emailing inmates and inmates was	8	out of the institution.
9	calling her phone collect.	9	This is after I got stabbed. This was in March
10	Like I don't know if that's true or not, but	10	of 2023 after I got stabbed, maybe the 14th, 15th,
11	they say that inmates was -- that she was sending	11	16th or 17th, sometime in March, when she came to my
12	inmates money, putting money on inmates' or Jaleel's	12	cell when I was still in Segregation after I came
13	account, sending him money, sending him porn, giving	13	back from the hospital from being stabbed.
14	him cell phones, having email accounts set up for	14	Q Okay, all right. So other than the PSU person,
15	them. Like it was a bunch of rumors. Like whether	15	Wolff, the allegations that you heard about Dixon
16	or not any of that is true or not, I don't know, but	16	bringing in contraband, that was all from other
17	that's what was being said.	17	inmates that you can't remember their names; is that
18	Q Okay. So who all was it said that she was having an	18	fair to say?
19	affair with, just Titus Henderson or Titus Henderson	19	A Correct. I want to say something real quick. You
20	and Jaleel both?	20	remember in the last deposition with the Meli
21	A Both.	21	deposition and the lady who popped up out of nowhere
22	Q Anybody else besides those two?	22	on the deposition who wasn't supposed to be there?
23	A Rumors is that those weren't the only inmates. I	23	Do you remember that?
24	heard it's even she got sexual relationships with	24	Q Yeah.
25	other inmates in other institutions that she hasn't	25	A That's Ms. Wolff.
Page 91		Page 93	
1	even worked at, I'm told. So I don't know, but	1	Q Okay, all right. So going back to this issue of
2	that's the -- like I said, it's just what I heard.	2	extortion, did anybody ever tell you that Dixon had
3	That's the rumor, that it wasn't limited to the	3	tried to extort money from them?
4	two inmates in Green Bay, it was more inmates in	4	A No, I never heard of them trying to extort money from
5	Green Bay and it was other inmates in other	5	anybody else. I wouldn't deny if it happened, but I
6	institutions as well.	6	haven't heard it myself. I think it was kind of
7	Q Okay. And again, these are just rumors that you	7	bold, but yeah, I never heard it myself.
8	heard from chatter up and down the cell hall; is that	8	Q All right. So the only instance that you know of
9	right?	9	Dixon trying to extort money was the \$2,000 that she
10	A I heard staff, correctional -- Wolff, PSU worker	10	tried to get you to pay; is that right?
11	Wolff. W-o-l-f-f, I think is how you spell her name.	11	A Correct.
12	She worked in Green Bay. She told me when she found	12	Q All right. Did anybody ever tell you that Dixon had
13	out about -- as a matter of fact, that's the person	13	been fired?
14	who -- as a matter of fact, let me correct something.	14	A The PSU worker and Cushing. The white shirt
15	I did talk to a staff about Dixon and the threat	15	supervisor in Green Bay named Cushing,
16	against me. I talked to Ms. Wolff, the PSU worker in	16	Daniel Cushing, he notified me that she got -- that
17	Green Bay Correctional Institution. And she's the	17	she got walked out, but he didn't tell me why. He
18	one that notified me about the other things, about	18	just said -- well, let me rephrase.
19	the cell phones and that she had an inappropriate	19	He told me she was messing with some inmates,
20	relationship. And so, yeah, that came out when she	20	that's all he told me. He didn't go into detail or
21	was asking me questions about why I got stabbed and I	21	none of that. He just told me -- and the only reason
22	told her about Dixon, so, yes, PSU worker Wolff in	22	she came up is because I was saying, telling him that
23	Green Bay Correctional Institution.	23	Dixon knew about it, so they couldn't even
24	As a matter of fact, she said she even emailed	24	investigate what she knew because she wasn't employed
25	the security director, telling her that -- telling	25	at Green Bay no more.

<p style="text-align: right;">Page 94</p> <p>1 Q So this was after the stabbing, fair?</p> <p>2 A This was after the stabbing in February, right.</p> <p>3 Q You said in February, but I think you mean in March;</p> <p>4 is that right?</p> <p>5 A I mean, yeah, the stabbing happened in March, yeah.</p> <p>6 It happened -- Cushing telling me this, yeah, it</p> <p>7 happened after the stabbing in March, correct.</p> <p>8 Q Okay. And he told you that Dixon had walked out, I</p> <p>9 think is the word you used?</p> <p>10 A They use the term when they -- when correctional</p> <p>11 officers use the term, "Oh, she got walked out," or,</p> <p>12 "He got walked out," that means they got fired, they</p> <p>13 got -- I don't think it literally means they got</p> <p>14 walked out, physically walked out. I think it's just</p> <p>15 a term that correctional officers use to describe a</p> <p>16 staff getting fired. They just use the term saying,</p> <p>17 "They got walked out."</p> <p>18 Q So you believe that Dixon was fired just based on</p> <p>19 what Captain Cushing told you?</p> <p>20 A That and PSU. You know, I had an incident with a</p> <p>21 couple COs or correctional officers that talked</p> <p>22 about her getting walked out, so I don't -- you know,</p> <p>23 they would know. They're co-workers. They would</p> <p>24 know if one of their own got fired, so I don't think</p> <p>25 they would be lying to me about one of their own</p>	<p style="text-align: right;">Page 96</p> <p>1 A Because I didn't know who was supposed to be a part</p> <p>2 of the plot. Like I don't want to go to somebody and</p> <p>3 I don't even know who all is involved, so that was</p> <p>4 information I kept to myself.</p> <p>5 Q So you didn't have any other inmates at the</p> <p>6 institution that you were friends with or that you</p> <p>7 trusted?</p> <p>8 A You're talking about before the incident happened</p> <p>9 that I could have went to?</p> <p>10 Q Yeah.</p> <p>11 A Could I have --</p> <p>12 Q Say it again.</p> <p>13 A You're talking about -- repeat the question.</p> <p>14 Q Yeah. Did you not have any friends at the</p> <p>15 institution that you trusted?</p> <p>16 A To do what, to help me in that situation?</p> <p>17 Q Yeah.</p> <p>18 A To help me what? The screen froze. I don't know.</p> <p>19 Can you hear me?</p> <p>20 THE REPORTER: I can hear you, but I</p> <p>21 think he's frozen. Just give it a second,</p> <p>22 there. Jonathon, yeah, you were frozen, so --</p> <p>23 MR. DAVIES: Yeah, I froze. I think</p> <p>24 Mr. Prude was just about to start his answer.</p> <p>25 (Reporter reads back)</p>
<p style="text-align: right;">Page 95</p> <p>1 getting fired.</p> <p>2 So, yes, that's where my information comes from,</p> <p>3 and inmates. I heard from guards before I heard from</p> <p>4 inmates, because when they -- when I got back from</p> <p>5 the hospital they tried to interview me about it,</p> <p>6 about my situation, and that's how I learned that</p> <p>7 Dixon got walked out.</p> <p>8 Q All right. So let's go back to the threats that</p> <p>9 Henderson was making towards you. So did you take</p> <p>10 his threat seriously when he threatened you in the</p> <p>11 shower?</p> <p>12 A Did I take it seriously? Yeah, I took it seriously.</p> <p>13 Q All right. So did you believe that he was going to</p> <p>14 attack you?</p> <p>15 A I didn't know if it was him or somebody else, but I</p> <p>16 believed that it was gonna happen.</p> <p>17 Q So what precautions did you take?</p> <p>18 A Oh, I guess you could say I was more alert of my</p> <p>19 surroundings, trying to be alert, trying to watch</p> <p>20 myself, watch for people walking behind me, just be</p> <p>21 cautious of my surroundings, things like that.</p> <p>22 Q Did you tell any friends about it so that they could</p> <p>23 watch your back?</p> <p>24 A No.</p> <p>25 Q Why not?</p>	<p style="text-align: right;">Page 97</p> <p>1 A So you're saying, you're asking me could I have went</p> <p>2 to other inmates who could have helped me fight other</p> <p>3 inmates; is that what you're asking?</p> <p>4 Q I'm asking you if you talked to any of your friends</p> <p>5 in order to get their help with the situation, but is</p> <p>6 your answer --</p> <p>7 A I'm asking you what type of help? I'm asking are you</p> <p>8 asking me could I have went to other inmates and got</p> <p>9 them to help me fight and defend myself against the</p> <p>10 threat against me? Is what what you're asking?</p> <p>11 Q To help you defend yourself, to help watch your</p> <p>12 property, to help, you know, provide moral support,</p> <p>13 to talk through issues, any sort of help.</p> <p>14 A Would that be allowed for me to do something like</p> <p>15 that? It sounds like you're advocating for me to go</p> <p>16 and get a whole group of people and start an</p> <p>17 institution war or something. It sounds like you're</p> <p>18 advocating that.</p> <p>19 Q I'm not advocating anything. I'm just asking if you</p> <p>20 had any friends at the institution that --</p> <p>21 A No, no. I already told you I didn't tell anybody. I</p> <p>22 didn't tell friends. I didn't tell anybody, nobody,</p> <p>23 until after the incident happened.</p> <p>24 Q Did you submit any Special Needs Placement Request or</p> <p>25 any requests for separation?</p>

Page 98		Page 100	
1	A No.	1	A The warden here did it. I reported it. When I got
2	Q Why not?	2	assaulted here, I reported it directly to the warden
3	A Again going back to the question, I didn't know who	3	here in this institution, Gary Boughton. I reported
4	to trust. A guard is involved in me getting	4	it to him, and he didn't do nothing, so --
5	assaulted, and then, you know, a lot of other guards,	5	Q I'm talking about back at February and March of 2023,
6	they questioned or they were suspicious that they	6	did you think that the warden then was corrupt?
7	believed that other guards was involved because	7	A I didn't know that he wasn't.
8	somebody put in an HSU slip in my name and got me	8	Q What about the deputy warden?
9	over there to HSU coincidentally with Titus	9	A I didn't know that he wasn't.
10	Henderson.	10	Q So you didn't have any information one way or another
11	So like that's rare to happen to where somebody	11	as to whether they specifically were corrupt?
12	can strategically set somebody else up by putting in	12	A Other than my experience and me reporting it and them
13	an HSU slip in their name and get them to a place	13	doing the opposite, putting somebody closer to me
14	where they want them to be. Like that's almost	14	when I'm saying, "Keep him away from me," other than
15	impossible to happen, so the only way I can see	15	my experience, yeah, like I say, I don't have any
16	that happening is if like -- but that was after the	16	specific knowledge that they're corrupt, but I don't
17	fact of me ended up being in the same area with	17	know that they wasn't.
18	Titus Henderson. But like I said, I just don't -- I	18	Q So is it a fair summary of what you're saying that
19	just don't trust report.	19	you thought it would be a waste of time to submit a
20	And plus, I guess in 2018 I did put in a	20	Special Placement Request?
21	keep-separate against another inmate in this	21	A If they wasn't -- if I didn't believe -- if I
22	institution, and instead of them following through,	22	believed that my safety wouldn't be even more put in
23	they put the inmate closer to me, and we had an	23	risk, yeah, I would have. I did it before, asking to
24	assault. It was a fight in this institution. So	24	be separated for certain things. It wasn't futile in
25	it's been many occasions where I've actually reported	25	those situations. It only became futile after
Page 99		Page 101	
1	that, "Hey, keep me away from this inmate. Hey, keep	1	repeatedly me doing this and nobody doing nothing.
2	that inmate away from me," and instead of them	2	And instead, they put me closer to the person who's
3	keeping me away, they actually put the inmate closer	3	supposed to be doing something to me.
4	to me in order for the assault to even take place.	4	That's what happened in this situation. They
5	So after me going through multiple situations like	5	moved me from one cell hall closer to the person
6	that, I don't believe them, especially when the	6	that Dixon told me was supposed to assault me. So
7	prison officials is aware.	7	this is a -- this is a history with them doing this.
8	And from what I'm learning from the criminal	8	"Hey, keep me away from this inmate. I got an issue
9	complaint that I submitted in this case, Cushing did	9	with him or he got an issue with me. I'm fearing for
10	know, from what I'm learning. I don't know what	10	my safety," and they put the inmate closer to me or
11	information he shared with -- that Titus shared with	11	put me closer to the inmate. This is a history of
12	Cushing, but there was a threat against me that was	12	this. So, yeah, I don't trust going to a prison and
13	made to Cushing about doing something to me or	13	saying, "Keep me separated from somebody," when the
14	wanting to be kept away from me for violence or	14	opposite always happens.
15	something. So they was aware of something between me	15	Q All right. Let's talk about the actual altercation
16	and Titus Henderson, because he reported it, he	16	now. So have you ever had any fights or had you
17	reported something. That's just important to the	17	ever had any fights prior to this incident with
18	criminal complaint that I submitted with this case.	18	Titus Henderson in March of 2023?
19	But, no, I don't -- I've been through a lot of	19	A No.
20	stuff to where I don't trust reporting my safety to	20	Q You'd never had a fight with another inmate?
21	certain prison officials, seeing as when I have done	21	A In 2023, no.
22	it in the past they put the person closer to me and	22	Q Let me rephrase the question. Prior to the fight
23	caused me to get assaulted. So, yeah, my trust is	23	with Titus Henderson in 2023 had you had any other
24	kind of altered by that.	24	fights with other inmates?
25	Q Did you think that the warden was corrupt?	25	A Yes.

Page 102		Page 104	
1	Q How many fights would you say you've been in?	1	Q So the dentist is in HSU, all right. So besides this
2	A You'd have to check my conduct report record. I'm	2	issue with your teeth, were you having any health
3	not sure.	3	problems?
4	Q More than five?	4	A No.
5	A Probably. I've been locked up 25 years, so probably.	5	Q So on March 11th were you expecting to go to HSU?
6	Q More than 10?	6	A No.
7	A You've got to check my record. You can find those	7	Q All right. Who told you to go to HSU?
8	records, that discovery, in my institution file.	8	A My door just popped. When my door popped, it was a
9	Q All right. Prior to the fight with Titus Henderson	9	loudspeaker that said my name, that I had HSU.
10	what was the last fight you had had?	10	Q And were you in General Population at this point?
11	A So what I just described up here in this institution	11	A Correct.
12	where I requested that the warden keep me separated	12	Q All right. So what is the normal procedure for
13	from somebody and it didn't happen and I got	13	when -- for how you're told to go to HSU? Is it
14	assaulted and I defended myself, so in 2018.	14	normally over the loudspeaker?
15	Q 2018, okay. So about five years before your fight	15	A No.
16	with Henderson, correct?	16	Q How do you normally get told?
17	A Correct.	17	A They bring a pass to your door.
18	Q Okay, all right. So the incident that you are	18	Q Did anybody bring a pass to your door?
19	complaining about in this case, it happened on	19	A No.
20	March 11, 2023; is that right?	20	Q Did you think it was odd that you were being told to
21	A I believe so. I believe that's the date.	21	go to HSU?
22	Q All right. And if I said that it happened sometime	22	A Yes. I said it to myself, that I thought it was odd.
23	between 12 and 1 p.m., would that sound right to you?	23	Q Did anybody escort you to HSU?
24	A I'd say between 11 and -- between 11 and 1, because I	24	A Yes.
25	went over there, counting -- no, yeah, you might be	25	Q Who?
Page 103		Page 105	
1	right. Yeah, yeah, I would say between 12 and 1,	1	A A correctional officer.
2	yes.	2	Q Do you remember which correctional officer?
3	Q Okay. Would you say you have a pretty clear memory	3	A Yes.
4	of the incident?	4	Q Who was it?
5	A Yeah, I have a pretty clear memory of the incident.	5	A I don't remember his name. I remember who he was. I
6	Q All right. So let's start at the beginning of the	6	just don't remember his name.
7	day. You were taken out of your cell to go to the	7	Q Was there just one correctional officer?
8	Health Services Unit, HSU; is that right?	8	A Correct.
9	A Correct.	9	Q Were there any other inmates going to HSU at the same
10	Q Had you submitted any Health Service Requests in the	10	time?
11	preceding weeks?	11	A Correct.
12	A No. Well --	12	Q Who?
13	Q Were you having health problems?	13	A Titus Henderson and some other inmate.
14	A Well, I did, but it was for a dental, to have my	14	Q Do you remember who the other inmate was?
15	teeth cleaned, and I think that was in December, I	15	A No.
16	believe, of 2022. I submitted a dental request to	16	Q So you never met him before?
17	have my teeth cleaned, but they'd already told me	17	A No.
18	that might take a year, a year to 18 months, because	18	Q Were you afraid to go to HSU when you were called to
19	they didn't have any dentists. So but, yes, I did	19	go?
20	submit a dental request, handwritten.	20	A I wouldn't say afraid. I was more puzzled, confused.
21	Q Is the dentist in the HSU, is it in the Health	21	People get passes. Sometimes you get passes,
22	Services Unit, or is that a different area?	22	unexpected passes. The pass itself didn't scare me,
23	A A different area from the cell hall?	23	but I just thought it was unusual that they didn't
24	Q A different area from HSU.	24	bring me an HSU pass. Instead, they just announced
25	A No, it is HSU.	25	it over the intercom. I thought that was unusual.

Page 106		Page 108	
1	Q Have you ever been told to go to HSU before without a	1	A No.
2	pass?	2	Q Why not?
3	A No.	3	A Because any time you're getting transported, I'm
4	Q How far is it from your cell to HSU?	4	aware of this. I'm aware that any time you're
5	A I'm not sure. You want like feet?	5	getting transported, that means there was no pass
6	Q If you have to guess in feet, that's fine. If you	6	provided to you. That's normal. Where you get
7	want to tell me how long it takes to walk, that's	7	transported and inmates come down who don't have a
8	fine too.	8	pass, they don't ask guards, "Hey, why I ain't got
9	A It would probably take about five minutes to walk, at	9	a pass?"
10	most.	10	When you have a pass, there is no escort.
11	Q Is it on the same level or up or down stairs?	11	When you don't have a pass, there is an escort. You
12	A No, you gotta go out of one building, you gotta walk	12	cannot move throughout the institution without having
13	outside, then you gotta walk into another building,	13	a pass, and if you don't have a pass, you must have
14	then you gotta go up a flight of stairs. That's the	14	an escort. So by me not having a pass, it made sense
15	HSU room. The HSU building and the treatment center,	15	that I had an escort.
16	it's the same building.	16	Q Did you talk with the guard at all during the
17	Q So did it take you about five minutes this time?	17	movement?
18	A Yes.	18	A Yes.
19	Q All right. So where did you meet the correctional	19	Q What did you say?
20	officer?	20	A I told him I didn't know why I was coming over here
21	A At the cell hall door.	21	to HSU, "I didn't put in any HSU slip. I don't
22	Q And in relation to your cell and HSU, where is that?	22	understand why I'm coming over here to HSU."
23	Is it like halfway, a quarter of the way,	23	Q What did he say?
24	three-quarters of the way?	24	A He said he don't know, he was just told to come get
25	A Probably in the middle of the cell hall.	25	me.
Page 107		Page 109	
1	Q So from your cell to HSU, it's about in the middle of	1	Q Did either of you say anything else?
2	that distance, would you say?	2	A I think I was complaining to him about my canteen.
3	A Oh, no, no, no. I thought you was saying where is my	3	There was a discrepancy about my canteen earlier that
4	cell from the time where the officer was at to the	4	day, and I was telling him about it. But other than
5	front of the cell hall. You're asking me where is my	5	that, no.
6	cell at in comparison to the distance of HSU?	6	Q Did you speak to either of the inmates that you were
7	Q Yeah, let me rephrase, because I was unclear, you're	7	walking with?
8	right. So I'm interested in where along the route	8	A No.
9	from your cell to HSU did you meet the officer?	9	Q Did they talk to each other at all?
10	A At the front of the cell hall door. There's a door	10	A I think so.
11	to the cell hall that exits the cell hall. That's	11	Q Did you hear what they said?
12	where the guard was standing at.	12	A I think the other one was saying that he wasn't aware
13	Q So how long does it take to walk from your cell to	13	why he was going to HSU either, the other guy who I
14	where the guard was?	14	don't know.
15	A Probably two minutes.	15	Q Did you remember anything else of what anybody said
16	Q And then about three minutes with the guard to HSU;	16	during the walk?
17	is that right?	17	A No, it was -- like it wasn't no issues. Like wasn't
18	A No, about -- yeah, I guess you could say that, no	18	nobody saying nothing that would make me raise my
19	longer than five minutes walking from the cell hall	19	alerts or make me worry. Like there was nothing
20	to the treatment center.	20	said, no conversations about nothing hostile.
21	Q Okay. Did you tell the guard that you didn't have a	21	I was talking about me not having a pass, and I
22	pass?	22	was talking about canteen. The other inmate was
23	A No. No, I didn't.	23	talking about why he don't know -- that he don't know
24	Q Did you tell the guard anything about the unusual	24	why he was being brought to HSU. That was the
25	situation?	25	conversation. It wasn't like -- it was just a

Page 110	Page 112
<p>1 regular conversation.</p> <p>2 Q So it was the other two inmates, yourself and the</p> <p>3 guard. Was there anybody else in the -- like walking</p> <p>4 with you or walking in the hallway?</p> <p>5 A No, just us.</p> <p>6 Q What happened when you reached HSU?</p> <p>7 A I walked in and asked them do they know why I'm here,</p> <p>8 do they know why I'm being brung here, what do the</p> <p>9 pass say, what is this for? They said they don't</p> <p>10 know but to just have a seat in the waiting room.</p> <p>11 Q And when you say they, who do you mean?</p> <p>12 A Correctional officers that was there, because you've</p> <p>13 gotta walk through a metal detector when you go in</p> <p>14 there, and they be standing right there. There's a</p> <p>15 sergeants cage right there. There's a little work</p> <p>16 station right there where the regular correctional</p> <p>17 officers be sitting at, and I asked them those</p> <p>18 questions.</p> <p>19 Q All right. So did you take a seat?</p> <p>20 A No.</p> <p>21 Q You continued to stand?</p> <p>22 A It ain't that I took a seat. I was on my way to go</p> <p>23 have a seat. They told me to just have a seat in the</p> <p>24 waiting room. The waiting room -- I'm pretty sure</p> <p>25 you seen the video that you furnished to the</p>	<p>1 ink pen, I guess.</p> <p>2 Q Did Titus Henderson say anything else to you other</p> <p>3 than, "This is for not paying"?</p> <p>4 A "This is for not paying Dixon," that's what was said.</p> <p>5 Q All right. But nothing else?</p> <p>6 A Or, "For Candy." He called her Candy. Everybody</p> <p>7 called her Candy. "This is for not paying Candy."</p> <p>8 Q All right. How did that fight end?</p> <p>9 A What you mean? I got stabbed. I went to HSU.</p> <p>10 Q Let's back up. After he stabbed you with something,</p> <p>11 did you fight back?</p> <p>12 A Yes.</p> <p>13 Q How long did that fight last?</p> <p>14 A I'm not sure. According to the video that you</p> <p>15 submitted to the institution, it looked like it was</p> <p>16 about 17, 20 seconds, something like that. It didn't</p> <p>17 last long.</p> <p>18 Q All right. Who do you think won the fight?</p> <p>19 A I don't know. Who you think won?</p> <p>20 Q All right. So how did the fight end? In the end,</p> <p>21 how did it come to a resolution?</p> <p>22 A Was that a joke when you asked me who do I think?</p> <p>23 Was that a joke to joke about me being stabbed?</p> <p>24 Q No, I'm asking you who do you think won the fight?</p> <p>25 A I'm saying you're looking at a person getting</p>
Page 111	Page 113
<p>1 institution, as far as me coming out of the whole</p> <p>2 scene, so that's how the scene looked.</p> <p>3 Q All right. Did you have any other words exchanged</p> <p>4 with Titus Henderson in the HSU?</p> <p>5 A No. There was no exchange of words, no.</p> <p>6 Q Well, did anybody say anything? Did he say anything</p> <p>7 to you?</p> <p>8 A Yeah, while I'm being stabbed, he said, "This is for</p> <p>9 not paying that fee." That's what was said.</p> <p>10 Q All right. So were you holding anything while you</p> <p>11 were in HSU?</p> <p>12 A No.</p> <p>13 Q All right. You said Henderson stabbed you. And it</p> <p>14 later turned out that he stabbed you with a pen; is</p> <p>15 that fair to say?</p> <p>16 A I don't know what it was. The investigator said</p> <p>17 that. I didn't know what it was.</p> <p>18 Q Okay. So you don't you know one way or another what</p> <p>19 it was?</p> <p>20 A When I got to the -- when I got to the hospital they</p> <p>21 told me. They showed me a picture of it. It was</p> <p>22 protruding out of my neck, and they said that it</p> <p>23 looked like an insert of an ink pen. That's what</p> <p>24 they said, but I don't know like specifically myself.</p> <p>25 But, yeah, everybody said an ink pen, the case of an</p>	<p>1 stabbed, my blood everywhere. I went to the</p> <p>2 hospital. Like what do you think?</p> <p>3 Q Okay. So how did the fight end?</p> <p>4 A You seen the video. It ended like you seen it ended.</p> <p>5 Q All right. So just whatever the video shows, that's</p> <p>6 what your account of the fight is, you don't have</p> <p>7 anything to add?</p> <p>8 A As far as how did it end? I'm saying the police</p> <p>9 broke it up, put me in handcuffs. I took my shirt</p> <p>10 off because I had stuff in my eye. They handcuffed</p> <p>11 me. I went to HSU. That's how the fight ended.</p> <p>12 Does it matter? Never mind, go ahead.</p> <p>13 Q Would you say that the officers did a good job of</p> <p>14 breaking up the fight?</p> <p>15 A I can't tell you what I think they did about the</p> <p>16 fight. I don't know. Do I think they did a good</p> <p>17 job? That's not -- that's not an opinion of mine to</p> <p>18 have. I had pepper spray in my eyes, so I ain't seen</p> <p>19 much. I don't know what they did.</p> <p>20 Q Okay. What happened when you were taken for</p> <p>21 treatment?</p> <p>22 A I had surgery.</p> <p>23 Q All right, let's back up. So were you treated first</p> <p>24 in the HSU?</p> <p>25 A No.</p>

Page 114

1 Q Were you taken straight to the hospital?
2 A Yes.
3 Q Was there an ambulance?
4 A Yes.
5 Q Have you reviewed your health records in this case?
6 A Have I -- have I reviewed my health records?
7 Q Yeah.
8 A Yes, I have.
9 Q Do you agree with what's contained in the health
10 records?
11 A As far as what, just everything?
12 Q Yeah, do you think there were any inaccuracies in the
13 health records that you want to note?
14 A That I want to note? If you think there's some, go
15 ahead and tell me.
16 Q No, I'm asking you. You know, I don't want to keep
17 you longer than necessary, Mr. Prude, so if you think
18 that the health records accurately state the
19 treatment you got, we don't need to go through it
20 blow by blow.
21 A All right.
22 Q So do you think the health records are accurate?
23 A Oh, yeah, I think they're accurate.
24 Q Did prison security staff ask you about the stabbing
25 afterwards?

Page 115

1 A Yes.
2 Q Who first asked you about the stabbing?
3 A Cushing. Well, I believe it was Cushing.
4 Q Did Security Director Kind talk to you at all?
5 A After the fact. I seen him in the hallway.
6 Q Yeah, so all my questions from this point on are
7 going to be about after the stabbing. So after the
8 stabbing did Security Director Kind ask you for a
9 statement?
10 A No.
11 Q He never asked you for a statement?
12 A No.
13 Q All right. So the first person that asked you for a
14 statement was Captain Cushing; is that right?
15 A Correct.
16 Q When was that?
17 A I believe the day of the stabbing. He came to the
18 actual hospital.
19 Q Okay. And let's describe that conversation. What
20 did he say to you?
21 A He asked me a bunch of questions about what happened.
22 Q And did you answer his questions?
23 A No.
24 Q Why not?
25 A For the reasons I previously gave about trusting the

Page 116

1 system, trusting certain correctional officers,
2 that's why.
3 Q Do you remember any of the specific questions he
4 asked you?
5 A No, not specifically, but paraphrasing, he was just
6 asking me about the situation, what happened, why
7 this, why that, and I told him, "I don't trust you.
8 I ain't telling you nothing." I think that was the
9 gist of it.
10 Q And again, you didn't trust him because you thought
11 that prison staff in general might be corrupt?
12 A Yes.
13 Q Did you have any specific information that Captain
14 Cushing was corrupt?
15 A Yeah, I done seen him do a lot of stuff. That wasn't
16 my first interaction with Cushing. I was in Waupun
17 prison with Cushing before he got transferred to
18 Green Bay, so he ain't too -- he ain't too straight
19 himself.
20 Q What specific incidents in the past made you think
21 that he was corrupt?
22 A Different things, lying, making stuff up,
23 disregarding rules that they're supposed to follow.
24 It's a lot.
25 Q All right. So you refused to answer Captain

Page 117

1 Cushing's questions. Did anybody else from the
2 prison ask you questions?
3 A Wolff. Me and Wolff had conversations.
4 Q More than one or just the one you described earlier?
5 A A few of them. We had quite a few conversations
6 about it.
7 Q All right. When was the first conversation?
8 A Probably March 13th.
9 Q And what did she say to you?
10 A Just asking me questions about what happened, why it
11 happened. She was concerned. A lot of other staff
12 was concerned, things like that.
13 Q And what did you say to her?
14 A I appreciate her being concerned, just talking about
15 it. It was a psych. She was my psychiatrist, so we
16 had those type of communications, about the impact of
17 me going through something like that. Those were the
18 communications I had with her
19 Q When was your next conversation with Wolff?
20 A I don't even know. The only reason I know that
21 specific date is because I got stabbed on a Saturday
22 and I came back on a Monday -- I mean on a Sunday,
23 and she didn't see me until the first weekday, which
24 was the Monday, which was the 13th, so that's how I
25 even remember that date specific, because she's the

Page 118	Page 120
<p>1 first person who pulled me out of my cell when I got 2 back from the hospital. 3 So during that week, on and off, like even right 4 up to the time when I left there, when I came here 5 and got transferred, like she always came and talked 6 to me about the whole situation, so, yeah, it's not a 7 specific set time. We've had multiple conversations. 8 She probably interviewed me for PSU mental health 9 reasons several times. Like they do their random 10 rounds. They check probably once or twice a week, 11 check in with inmates, make sure everybody is all 12 right, and every time she'd have a conversation with 13 me about how I'm doing. 14 Q So she was treating you while you were at GBCI. When 15 did you transfer? 16 A I transferred from GBCI December 20th of 2023. 17 Q And have you discussed this stabbing incident with 18 any psychological or psychiatric or medical people at 19 the current institution? 20 A Correct. 21 Q Who? 22 A Bird, PSU worker Bird, Program Facilitator Miller, 23 yeah, those two, Miller and Bird. 24 Q Okay. But you don't remember besides those two? 25 A I only have one PSU worker. Are you talking about</p>	<p>1 just asked me questions about how I'm doing. 2 Q So you don't know anybody's name specifically? 3 A Red Beard. I don't know his real name. He's a guard 4 in Green Bay. Everybody called him Red Beard because 5 he's got a red beard, but I don't know his real name. 6 It's a lot of other staff who seen me and would just 7 speak to me and greeted me. I don't know. 8 No, I don't particularly try to remember certain 9 guards' names. I'm not -- I'm not a social butterfly 10 to remember everybody's name like that. 11 Q Did law enforcement ever contact you about the 12 stabbing? 13 A They tried to, yeah, they have. 14 Q Who tried to contact you? 15 A First, a detective. I think a Brown County sheriff 16 tried to come talk to me when I was in Green Bay 17 about the situation. 18 Q And did you speak to him? 19 A No. 20 Q Why not? 21 A Because I chose not to. 22 Q All right. And why did you choose not to? 23 A Because it was nothing they can do. It already 24 happened. It seemed like everybody wanted to give 25 attention to it after it happened, but don't</p>
Page 119	Page 121
<p>1 staff for psychological reasons or -- 2 Q Yeah, anybody in the Psychological or Health Services 3 Unit. 4 A Oh, yeah, I don't know their names, but medical 5 staff, they've treated me since I've been here and 6 had conversations with me about it. 7 Q All right. So apart from Captain Cushing, Wolff and 8 then the PSU and HSU folks, have you talked about the 9 stabbing with any other prison officials or staff? 10 A Yes, the inmate complaint department in Green Bay. I 11 think his name is Degroot, I think. He's the one 12 that told me that they couldn't investigate what part 13 she played in it because she was no longer employed. 14 Q Okay, so you went through the inmate complaint 15 process. Any conversations with prison staff outside 16 the inmate complaint process? 17 A I'm pretty sure I have. Like me being stabbed was a 18 big thing, so you might have guards that just seen me 19 like, "Prude, you all right," and like just have 20 conversations. So, yeah, I done had a litany of 21 conversations with staff about my situation, so yeah. 22 Q Do you recall anybody's name that you had a 23 conversation with? 24 A Staff, man, just staff. Like it be some staff that I 25 don't even know their name that know me like that</p>	<p>1 nobody -- like even according to the reports that's 2 in the file where he tried to told them something 3 about wanting to stay away from me, it's now like 4 everybody wants to come talk to me about something 5 that me giving statements or having communications 6 ain't gonna change what happened to me, so I didn't 7 feel the need to have a conversation about it. 8 Q Are you aware that Mr. Henderson was criminally 9 charged for this stabbing? 10 A Yes. 11 Q Did you provide any evidence in the criminal 12 proceedings? 13 A No. 14 Q Why not? 15 A That's not my job, to provide evidence. 16 Q Do you expect to testify at Mr. Henderson's criminal 17 trial? 18 A Do I expect to testify? 19 Q Yeah. 20 A Not to my knowledge. I can't force somebody to -- I 21 don't know what they plan on doing. I don't know 22 what's going on with his situation. Ain't nobody 23 contacted me about nothing, so whether or not I'm 24 expected to or not, I don't know what somebody else's 25 expectations is. I don't know what's going on with</p>

Page 122		Page 124	
1	his situation.	1	got rotten apples everywhere as far as their own
2	Q Would you testify at his trial if you were given the	2	co-workers, just like the Department of Justice. I
3	opportunity?	3	believe there's some rotten apples in that agency,
4	A Would I testify at his trial if given the	4	but not all of them.
5	opportunity?	5	I don't think all of y'all are bad. I think
6	Q Yeah.	6	some of y'all just got -- you know, I done seen some
7	A You said if given the opportunity?	7	of the cases that y'all litigate and some of the
8	Q Yeah, if you were called to testify at his trial,	8	arguments y'all be making, and it be like if you can
9	would you do it?	9	finesse a detail, you will; if you can withhold a
10	A No.	10	detail, you will. So I done seen manipulation go
11	Q Why not?	11	around, so yes, I'm kind of skeptical of trusting
12	A Because it's the same system that put me in my	12	certain individuals who have shown themselves to be
13	situation and now y'all want to use me to prosecute	13	manipulative.
14	somebody else. Like I got stabbed because a guard	14	Q All right. Do you have any hope one way or another
15	did this. Now they want to come get me and want me	15	about whether Mr. Henderson is found guilty or not?
16	to help them?	16	A Do I have any what?
17	It's not my job to put somebody in prison or get	17	Q Do you hope one way or another that he's found guilty
18	something. Like that ain't my job. Whatever	18	or not?
19	evidence y'all got -- when I say y'all, I'm talking	19	A That's not my job, to give you an opinion about his
20	about you and the prosecution that you probably	20	situation. I don't -- I don't care. It's not my
21	communicate with. Whatever is going on with that,	21	situation. I don't have an opinion about what y'all
22	that ain't have nothing to do with me.	22	plan on doing to him. That's not my business.
23	Q So you think that the judicial system is subject to	23	Q So you don't care one way or another whether he's
24	the same problems as the correctional system?	24	found guilty of stabbing you?
25	A I'm saying you tell me. You're working for -- you're	25	A I litigated -- I filed this case because Dixon was
Page 123		Page 125	
1	defending a correctional guard who was smuggling in	1	involved in something against me. That's what my
2	drugs. You work for the Department of Justice,	2	concern is. I didn't initiate a proceeding against
3	emphasis on justice, and you're defending a guard who	3	him. I initiated a proceeding against Dixon, so
4	you know got walked out. There's a reason why I	4	whatever y'all decide to do with him in y'all's
5	believe you don't want to submit me certain discovery	5	prosecution of cases or hearings, it has nothing to
6	requests, because you know what's in them.	6	do with me. I don't have an opinion on it. I don't
7	So I believe it's kind of -- you know, it's kind	7	care one way or another.
8	of almost contradictory to work for the Department of	8	Q Let's talk about written documentation from after the
9	Justice but be defending a guard that you know	9	stabbing. So have you written any letters or emails
10	engaged in illegal conduct or misconduct. So, yeah,	10	to anybody about the stabbing since it happened?
11	I believe when the government feels something	11	A Probably.
12	benefits them or don't benefit them, they will	12	Q Who did you write to?
13	advocate it. If it don't benefit them, they'll turn	13	A Probably friends, just notifying people why I was
14	a blind eye.	14	stabbed.
15	So in this situation, I got assaulted with the	15	Q Which friends?
16	assistance of a guard. You're defending them, and	16	A You're talking about over what, almost a year and a
17	now y'all want me to help y'all prosecute him. It's	17	half ago now, man. I got a bunch of friends, family,
18	not gonna happen. So, no, I'm not testifying. That	18	lawyers I've talked to about this, guards. It's a
19	ain't my job. Whatever y'all got against him, that's	19	list.
20	y'all's.	20	Q Do you have any copies of the letters that you sent?
21	Q So do you think the judicial system is corrupt like	21	A No, I don't keep copies of letters. When I -- when I
22	the corrections system?	22	write letters, those are the originals. The only
23	A Not everybody. I don't think everybody's corrupt. I	23	time I keep copies of anything is when I litigate and
24	don't think -- I think you've got rotten apples	24	need to retain a copy, but communications to family,
25	everywhere. Even some guards will tell you you've	25	I don't retain copies of letters. I just send the

Page 126	Page 128
<p>1 letter out.</p> <p>2 Q All right. What about emails, did you personally</p> <p>3 write any emails about this incident?</p> <p>4 A Probably.</p> <p>5 Q What's your email address?</p> <p>6 A I don't have an email address.</p> <p>7 Q So how did you write an email?</p> <p>8 A Through the prison. The prison gives us -- we don't</p> <p>9 have a -- like it ain't a Yahoo or a Gmail or like</p> <p>10 that. The prison system has a system that allows</p> <p>11 inmates to email family, friends, lawyers, things</p> <p>12 like that.</p> <p>13 Q Okay, so it's really through the prison</p> <p>14 correspondence system. Who do you think you sent an</p> <p>15 email to?</p> <p>16 A Probably my mama, friends, relatives, people who just</p> <p>17 wanted to know why, when did it happen, what happened</p> <p>18 at the hospital, what did the doctors say, things</p> <p>19 like that, notifying them of my condition.</p> <p>20 Q Did you direct anybody to send correspondence on your</p> <p>21 behalf regarding this incident?</p> <p>22 A Send correspondence to who?</p> <p>23 Q Just send any correspondence.</p> <p>24 A To who? That's a broad -- that's kind of broad.</p> <p>25 Q Well, we can get into who you sent it to if you did,</p>	<p>1 You're taking my corrupt term and applying it to</p> <p>2 Brown County and Kevin Carr and everybody else.</p> <p>3 MR. DAVIES: Understood. Thank you</p> <p>4 for clarifying that. All right, last few</p> <p>5 questions. Why did you not -- actually, you</p> <p>6 know what? I'm going to end there, Mr. Prude.</p> <p>7 I think we have been here quite long enough for</p> <p>8 the day, and I think we can go off the record.</p> <p>9 (Discussion off the record)</p> <p>10 MR. PRUDE: I'm requesting a discovery</p> <p>11 request to you, Jonathon Davies, of the</p> <p>12 documents in this case, the transcript, the</p> <p>13 deposition transcript. I would like a copy of</p> <p>14 that as my discovery request.</p> <p>15 I don't want to wait until summary</p> <p>16 judgment to have evidence to use. I want to be</p> <p>17 able to prepare. I think I'm entitled to the</p> <p>18 deposition. This here is evidence. This</p> <p>19 document is evidence. You're saying you're not</p> <p>20 going to give it to me?</p> <p>21 MR. DAVIES: Well, Mr. Prude, I'm not</p> <p>22 sure this is the right place to have that</p> <p>23 conversation. You're free to send a discovery</p> <p>24 request. I don't guarantee that we'll send you</p> <p>25 a copy of the deposition. For one thing, I</p>
Page 127	Page 129
<p>1 but did you ask anybody to send correspondence on</p> <p>2 your behalf about this?</p> <p>3 A No, I didn't -- well, probably. Correspondence could</p> <p>4 be a communication, "Hey, tell such and such I'm</p> <p>5 doing all right. Get a message to my auntie and tell</p> <p>6 her I'm doing okay." Yeah, I done did that quite a</p> <p>7 few times.</p> <p>8 Q I want to go back to this issue of corruption one</p> <p>9 more time. Do you believe that the secretary of the</p> <p>10 Department of Corrections is corrupt?</p> <p>11 A No.</p> <p>12 Q Do you believe that the corrections complaint</p> <p>13 examiner is corrupt?</p> <p>14 A Not to my knowledge.</p> <p>15 Q Do you believe that the Brown County Sheriff's</p> <p>16 Department is corrupt?</p> <p>17 A Not to my knowledge. I think you're confusing why I</p> <p>18 didn't want to talk to correctional officers versus</p> <p>19 why I didn't want to talk to Brown County Sheriff's</p> <p>20 Department. I think you're intertwining the two</p> <p>21 reasons.</p> <p>22 I never said Brown County Sheriff's was</p> <p>23 corrupt. I talked about why I didn't notify</p> <p>24 correctional officers before I got stabbed, and I</p> <p>25 gave an explanation why I thought they were corrupt.</p>	<p>1 believe discovery is shortly going to close in</p> <p>2 this case; and for another thing, I don't</p> <p>3 believe that the Department of Justice or the</p> <p>4 defendant have an obligation to buy you copies</p> <p>5 of the deposition transcript. You'll get those</p> <p>6 in the course of the litigation if they're used.</p> <p>7 If are you done, Mr. Prude, I think we'll</p> <p>8 go back off the record</p> <p>9 MR. PRUDE: All right, man. I wasn't</p> <p>10 asking you to buy me documents, man. I was</p> <p>11 requesting discovery requests. That's what I</p> <p>12 was requesting. I'm not asking you to go into</p> <p>13 your pocket and provide me anything.</p> <p>14 I'm just seeking discovery requests.</p> <p>15 If it requires you to go into your pocket,</p> <p>16 that's something that you've got to take up, but</p> <p>17 I'm just inquiring -- but never mind, I'll file</p> <p>18 a motion for discovery. I'll quote some of the</p> <p>19 language you used today as to that you won't</p> <p>20 give it to me before I even request the</p> <p>21 discovery, but okay. Thank you.</p> <p>22 MR. DAVIES: All right. We'll go back</p> <p>23 off the record again.</p> <p>24 (Adjourned at 4:36 p.m.)</p> <p>25</p>

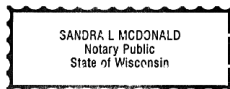
1 STATE OF WISCONSIN)
)
2 COUNTY OF DANE)

3 I, SANDRA L. McDONALD, Shorthand Reporter
4 and Notary Public in and for the State of Wisconsin,
5 do hereby certify that the foregoing is a true
6 record of the videoconference deposition of
7 TERRANCE PRUDE, who was first duly sworn by me;
8 having been taken on the 13th day of May, 2024,
9 from the Wisconsin Secure Program Facility,
10 1101 Morrison Drive, in the City of Boscobel, County
11 of Grant and State of Wisconsin, in my presence, and
12 reduced to writing in accordance with my stenographic
13 notes made at said time and place.

14 I further certify that I am not a relative
15 or employee or attorney or counsel for any of the
16 parties, or a relative or employee of such attorney
17 or counsel, or financially interested in said action.

18 In witness whereof, I have hereunto set my
19 hand and affixed my seal of office this 3rd day of
20 June, 2024.

Sandra L. McDonald



Notary Public, State of Wisconsin
My Commission Expires 10/18/26

<hr/>	2021 26:8,23 27:2,6 29:11 61:17	ability 6:3
<hr/>	2022 12:22 30:1,2,4,5,6 31:4,5 34:7 37:7 39:4,11 46:24 62:7,8,13,16 63:3, 5,11,15,19 103:16	AC 26:14,16
<hr/>	2023 12:22 13:13 46:13,20 47:1,4 49:2,9,14,21 50:8 53:15,16 92:10 100:5 101:18,21,23 102:20 118:16	access 69:8
<hr/>	2023-08179 3:8	account 72:20,22 90:13 113:6
<hr/>	20th 118:16	accounts 90:14
<hr/>	22 31:6	accurate 41:1 114:22,23
<hr/>	23-C-1233 3:14,16	accurately 5:23 114:18
<hr/>	23-CV-08179 3:12	accused 60:11
<hr/>	25 102:5	achieve 15:21
<hr/>	2:39 61:10	act 42:15 81:2
<hr/>	2:49 61:10	acting 38:3 50:2
<hr/>	3	activities 57:12 58:7,9
<hr/>	30 48:16 50:22 51:25	activity 58:10,13,14
<hr/>	4	actual 49:5 101:15 115:18
<hr/>	40 48:16	add 113:7
<hr/>	42 15:6	address 126:5,6
<hr/>	4:36 129:24	adjourned 129:24
<hr/>	6	administration 81:8
<hr/>	6 68:13,14,16	administrative 13:6,9 26:6,10,16,20 29:2,4,5
<hr/>	60 16:23 17:9	admissible 18:2
<hr/>	60-year 16:19	advice 11:6 12:14
<hr/>	8	advocate 123:13
<hr/>	80-year 16:12,17 17:7	advocating 97:15,18,19
<hr/>	9	affair 90:19
<hr/>	97 18:20	affiliated 59:20
<hr/>	A	affiliation 58:13
<hr/>	A-L-D-R-I-C-H 15:14	affiliations 36:24 59:8
		afraid 105:18,20
		afternoon 3:7
		agency 124:3
		agenda 82:14
		agree 114:9
		agreement 16:4,5
		ahead 8:18 14:24 15:1 24:8 30:25 31:1 34:13 38:20 45:9 46:12 48:10,11 49:25 52:16 59:19 71:25 113:12 114:15

Aldrich 15:9,12	attention 84:23 120:25	believing 79:2
alert 95:18,19	attorneys 12:17	belonged 30:18 33:18 84:25
alerts 109:19	auntie 127:5	belongs 54:19
allegations 66:13 92:15	auto 18:18,19,23	benefit 123:12,13
allowed 97:14	avoid 72:19 73:7,12,15,19,22 74:17,19	benefits 123:12
altercation 101:15	aware 28:10 34:1,12 54:18,21,22 58:21,24 63:6 69:9 81:23 99:7,15 108:4 109:12 121:8	big 48:16 89:18 119:18
altered 99:24		Bird 11:15,22 118:22,23
alternative 42:23		black 62:1
ambulance 114:3		blind 123:14
Anderson 45:6	B	blood 29:15,22 113:1
announced 105:24	back 14:2 25:10,23 26:14,15,16 34:9,13,14,16,17,19 35:15 37:5,8,12,16 38:9,10 42:2,5,22,24 43:4,7,14,23 44:1 45:13,20 48:4 49:19 52:5,19 55:6 61:8,13 64:18,22 67:4,6 71:25 79:2 88:21 92:13 93:1 95:4,8,23 96:25 98:3 100:5 112:10,11 113:23 117:22 118:2 127:8 129:8,22	blow 114:20
answering 4:10 5:3	background 15:3	body 32:22,23 33:8,9 65:9,11 68:20 69:11,13 83:19 85:16
answers 5:15	backing 62:14	bold 93:7
anybody's 88:9 119:22 120:2	bad 29:12,13,15,22 124:5	Boscobel 22:13,14,15,18 23:15,17 24:16,19,20,21,22,25 25:3,16 76:16
app 72:15,16,17,19,20,22 73:23 74:22	ballpark 4:11	Boughton 100:3
apples 123:24 124:1,3	Bangs 72:17	break 5:18,20 61:8
apply 81:3	based 70:13 74:4 79:25 94:18	breakfast 65:2,3,4 68:12,15
applying 128:1	basic 15:3	breaking 64:21 113:14
approach 43:1	basically 48:6 80:25	bring 104:17,18 105:24
approximate 68:19	bat 21:3	bringing 79:7,9,14,17,20 80:1,24 81:24 89:13 92:16
approximately 26:7 50:6 53:21 68:17	battle 16:15	broad 57:6 126:24
area 98:17 103:22,23,24	Bay 25:19,20,22 26:2,3,5 63:21 76:16 77:18 79:18 87:8,20 91:4,5,12,17,23 93:15,25 116:18 119:10 120:4,16	broke 62:25 113:9
areas 83:19	beard 120:3,4,5	brothers 40:14 41:11,14
arguments 124:8	beat 40:6	brought 84:22 109:24
armed 16:2,6,8,10	begin 15:23 59:6	Brown 120:15 127:15,19,22 128:2
assault 46:13 49:5,13 52:17 72:19 73:8,15,16,17,19,22 74:1,2,19 76:25 77:3,7,13 98:24 99:4 101:6	beginning 35:6 103:6	brung 110:8
assaulted 57:15,16,17 73:21 74:23 98:5 99:23 100:2 102:14 123:15	behalf 38:4 50:2 53:8,18 54:2 126:21 127:2	building 106:12,13,15,16
assistance 24:5 123:16	belief 31:18,19	bullshit 86:9
assume 5:8 71:19	believed 30:10,21 35:2,8 79:8 81:11 92:1,4 95:16 98:7 100:22	bunch 30:16 49:17 59:13 86:9 90:15 115:21 125:17
assumed 74:11		business 124:22
assuming 74:8 83:15		butterfly 120:9
attack 40:10 60:17,20 95:14		button 69:9
attacking 70:13		buy 129:4,10
attempt 42:13,15 43:3		

C		
<p>cage 110:15</p> <p>call 30:12 32:7 35:6 76:4,8 79:11</p> <p>called 30:12 51:23 105:18 112:6,7 120:4 122:8</p> <p>calling 90:9</p> <p>calls 29:7</p> <p>camera 65:9,11 68:20</p> <p>cameras 69:11,13</p> <p>campaign 79:19</p> <p>Candy 72:15,17 112:6,7</p> <p>Candyland 72:17</p> <p>canteen 109:2,3,22</p> <p>Captain 94:19 115:14 116:13,25 119:7</p> <p>captains 82:2</p> <p>care 124:20,23 125:7</p> <p>Carr 128:2</p> <p>carried 57:13 58:22</p> <p>carries 58:23</p> <p>carry 58:8,25</p> <p>case 3:8,11 4:17 7:17,18,24 8:3 9:10 12:22,24 13:7,11,12,16 14:3 15:4 18:15 21:3 59:9 61:15 99:9,18 102:19 111:25 114:5 124:25 128:12 129:2</p> <p>cases 19:5,13 124:7 125:5</p> <p>cash 72:15,16,17,19,20,22 73:23 74:22</p> <p>casual 23:10,11</p> <p>Catholics 58:17</p> <p>caused 99:23</p> <p>cautious 95:21</p> <p>cell 27:8,10,19 37:11 43:11 63:16,21, 22 64:1 65:7,13,22,23 66:12,15,22,23, 25 67:1,22,25 68:2,6 70:9 72:3,14 73:9,18 74:12 75:8 76:10 79:17 88:21, 22 90:4,14 91:8,19 92:12 101:5 103:7, 23 106:4,21,22,25 107:1,4,5,6,9,10, 11,13,19 118:1</p> <p>center 106:15 107:20</p>	<p>certiorari 13:16</p> <p>chance 87:10</p> <p>change 30:1,5 121:6</p> <p>changed 30:7</p> <p>characterize 57:5</p> <p>charged 4:24 121:9</p> <p>charges 19:10,14</p> <p>chatter 91:8</p> <p>check 102:2,7 118:10,11</p> <p>Chemical 15:9,12</p> <p>child 20:4,6</p> <p>child's 20:6</p> <p>choose 120:22</p> <p>chose 120:21</p> <p>Christians 58:17</p> <p>Christmas 64:8,15</p> <p>circumstances 87:19</p> <p>civil 19:17,23 20:5,6,10,12</p> <p>claims 21:2</p> <p>clarifying 17:10 18:15 128:4</p> <p>classify 78:9</p> <p>cleaned 103:15,17</p> <p>clear 21:20 40:20 46:8,22 49:7 52:14 66:5 73:15 103:3,5</p> <p>close 51:10 129:1</p> <p>closer 31:10 98:23 99:3,22 100:13 101:2,5,10,11</p> <p>closest 48:18</p> <p>co-workers 94:23 124:2</p> <p>coincidentally 98:9</p> <p>collect 90:9</p> <p>comfortable 80:3</p> <p>comment 70:24</p> <p>commit 58:16,17,19</p> <p>communicate 12:17 75:13 122:21</p> <p>communicated 14:6,12 49:10,11</p> <p>communicating 90:5</p>	<p>communication 10:2,5 13:3 24:14 27:21,22 28:16 46:2,3,4 49:16 51:18 52:22 62:23 67:21 78:22 127:4</p> <p>communications 12:6 14:11,19,21 22:20,21 24:17 27:15 39:2 50:4 52:13 75:11,15 78:23 117:16,18 121:5 125:24</p> <p>company 15:9,10,12</p> <p>compare 83:24 84:2</p> <p>comparison 107:6</p> <p>compel 8:8</p> <p>complaining 102:19 109:2</p> <p>complaint 21:4 54:11,12 99:9,18 119:10,14,16 127:12</p> <p>complaints 13:2,8 23:7</p> <p>comrades 41:16</p> <p>concern 78:18 125:2</p> <p>concerned 78:20,21 82:7 92:5,6 117:11,12,14</p> <p>concerns 82:5</p> <p>condition 126:19</p> <p>conduct 19:3 60:15 69:1 77:19 81:4 102:2 123:10</p> <p>Confinement 26:6,10,17,20 29:2,4,6</p> <p>confronted 46:20</p> <p>confronting 88:18</p> <p>confused 105:20</p> <p>confusing 127:17</p> <p>contact 120:11,14</p> <p>contacted 121:23</p> <p>contained 114:9</p> <p>context 61:20</p> <p>continued 110:21</p> <p>contraband 80:6 88:25 89:7,22 92:16</p> <p>contradictory 123:8</p> <p>conversation 22:22 23:1,5 24:2,3,4 27:24 28:5,7,17,22 36:18 39:12,14 43:4 45:17,25 46:23,25 47:3,16,19 48:7 49:1,2,9,12,20 50:7,16,17,24 52:8,21,23,25 53:1,3,6,14 55:10 56:7 58:2 62:5,12,14 63:10,13,16 65:6,14</p>

66:14 67:7,14 68:21 71:8,11,22,24
72:12 74:4,5 75:6,7,8 77:12 78:7
88:12 109:25 110:1 115:19 117:7,19
118:12 119:23 121:7 128:23

conversations 9:14 10:1 22:20 23:3,
4,10,11 27:12 28:14,24 37:13 38:8,25
39:6 43:22 45:25 46:5,7,9 49:13,22
50:1,6,10 52:10,18,20 53:4,7,17,20,
22,23 54:1 61:14 66:9 68:5 69:4
75:18,19 76:18 77:2,4,6,8,14 78:2,25
80:7,8,11,12 81:7 86:4 109:20 117:3,5
118:7 119:6,15,20,21

convicted 17:22 18:19,23 19:2

convictions 17:18

cool 84:11

coordinator 60:15

copies 13:18 14:9,15,16,18 69:5
125:20,21,23,25 129:4

copy 125:24 128:13,25

correct 3:15 7:20 8:14 14:17,21,22
21:7 24:18 26:25 37:19,20 39:13 44:8,
13 45:16 47:2 49:14 50:9,23 52:2,18
53:24,25 54:4 63:14 67:8,9 68:8 73:1
78:1 85:21 91:14 92:19 93:11 94:7
102:16,17 103:9 104:11 105:8,11
115:15 118:20

correctional 43:11,13 47:12 61:21
62:2 79:9 87:8 89:9 91:10,17,23
94:10,15,21 105:1,2,7 106:19 110:12,
16 116:1 122:24 123:1 127:18,24

corrections 80:5 123:22 127:10,12

correspond 11:25

correspondence 12:20,25 13:10,22
14:10 62:15 126:14,20,22,23 127:1,3

correspondences 62:20

corroborating 48:6

corrupt 77:21,24 79:3,4,5 80:16,18,
20,23 99:25 100:6,11,16 116:11,14,21
123:21,23 127:10,13,16,23,25 128:1

corruption 127:8

COS 80:17 94:21

cost 70:15

counsel 12:24

count 16:6 20:4

counting 102:25

County 120:15 127:15,19,22 128:2

couple 10:13 11:18 27:8 30:13,14
37:10,16 50:10 72:2 94:21

court 5:11 6:15,18,25 7:3,19,21
13:12,15 14:4 15:13 17:25

courtroom 6:11,12,21

Cousins 78:17

covered 33:5,6 84:16

crime 17:22

crimes 58:16,17,19,20,21,23,25

criminal 13:16 17:16 19:5,13 54:11
58:9,10,13,14 99:8,18 121:11,16

criminally 121:8

cropped 83:22 85:6,16

cuffing 34:5

culture 89:8

current 15:24 118:19

Cushing 93:14,15,16 94:6,19 99:9,
12,13 115:3,14 116:14,16,17 119:7

Cushing's 117:1

cut 14:25

D

damn 44:21

dangerous 41:20

Daniel 93:16

date 64:12 102:21 117:21,25

Davies 3:6 17:24 57:18 59:10 61:7,12
96:23 128:3,11,21 129:22

day 64:3,18,22 67:12,13 68:10 72:6,8
103:7 109:4 115:17 128:8

days 72:2

daytime 64:5,25 68:11

debt 42:16

December 63:11,15 64:7,8,10,11,12,
14,17 103:15 118:16

decide 125:4

declarations 8:1,2

defend 97:9,11

defendant 19:16,18,21,23 20:7 61:14
129:4

defended 102:14

defending 123:1,3,9,16

definite 4:6

definitive 63:25

degree 19:4

Degroot 119:11

dental 103:14,16,20

dentist 103:21 104:1

dentists 103:19

deny 93:5

department 20:24 119:10 123:2,8
124:2 127:10,16,20 129:3

depending 84:9 85:13

depends 57:3,11 61:2,3

deposed 3:10,17,19

deposition 3:8 6:15 7:14 8:16,23,24
9:4 10:11,19,20,22,23,25 11:1,7,9,12,
14,19 12:2,8,15,18 17:25 45:7 59:13
92:20,21,22 128:13,18,25 129:5

depositions 6:10

deputy 100:8

derived 73:16

derives 73:13

describe 22:14 29:10 50:24 72:12
85:3 94:15 115:19

describing 43:15 44:10 86:6

description 43:18,20

descriptions 44:9

designate 57:9

detail 85:3 93:20 124:9,10

detailed 4:18

details 28:24 29:1 40:8 41:4 45:14,21
70:7 75:5

detective 120:15

detector 110:13

determine 57:6

determined 18:3 60:14

deterred 81:20,21	document 128:19	enforcement 120:11
development 57:3	documentation 125:8	engage 58:9 81:4
dinner 65:3,4	documents 7:2,13,17,18,24 8:5,6,7 60:10 128:12 129:10	engaged 58:10,12 77:19 79:23 81:24 89:12 123:10
dinnertime 68:12	door 68:1,3 73:14 87:13 104:8,17,18 106:21 107:10	engaging 23:1 28:7 80:1
direct 22:21 27:21 28:16 32:1 46:9 62:23 75:13,16 126:20	doors 10:6	entire 24:15 26:10,17,18 27:1
directly 27:21 28:3 31:20 37:18 46:11,14,17 49:10 50:5 74:9 84:4 100:2	double 43:23	entitled 18:1 128:17
director 71:10,17,19,21 80:20 91:25 92:3 115:4,8	double-check 44:1	environment 87:15
directors 82:2	doubt 69:6	escort 104:23 108:10,11,14,15
Disciple 58:11	drug 79:19	everybody's 7:7 33:17 120:10 123:23
Disciples 56:18,22 57:2 58:8,16,19, 22,24 59:2,21,24 60:4,17,19,23	drugs 59:1 79:7,9,12,14,17 80:1,24 81:24 89:13,19 123:2	evidence 7:22,23,24 8:3 121:11,15 122:19 128:16,18,19
disciplinary 60:11,16	drying 52:6,7	exact 25:8 40:2,22 64:12
discovery 8:7,8 11:2 18:1 102:8 123:5 128:10,14,23 129:1,11,14,18,21	DS 26:14,15	EXAMINATION 3:5 61:11
discrepancy 109:3	dude 35:21,22	examined 3:3
discuss 11:9 54:24 55:12 61:4 78:2, 16	duly 3:2	examiner 127:13
discussed 9:11 43:9 55:1 78:15 118:17	dynamics 10:17	exchange 27:15 62:15,22 73:5 75:11, 15 111:5
discussion 128:9	<hr/> E <hr/>	exchanged 12:20,25 111:3
discussions 56:2	earlier 109:3 117:4	exclusive 58:15,24
disguise 84:17	early 31:6 50:14,19 64:8	excuse 30:4
disorderly 19:3	easier 37:14	exercised 76:11
disparities 29:8	Eastern 3:8	exist 88:19
disregarding 116:23	easy 44:18	existed 86:20,22,25 88:16
distance 51:11,12 107:2,6	education 15:16,18	exits 107:11
distinguishment 82:17	electronic 75:15	expect 16:14 121:16,18
District 3:8	else's 121:24	expectations 121:25
Dixon 32:16 33:14,22,24 34:1 37:10, 13 43:8 44:7,11 45:15 46:21 47:11,12 49:16,20 55:2,4,11,18 56:9 57:16 61:15,16 62:6,17 67:11 71:23,24 75:9, 19 76:21 77:2,6,12,14 78:2,25 79:4 80:12 81:7 82:13,21 83:2,23 85:2,9 86:1,14,21 87:4 88:17,24 89:19 91:15, 22 92:15 93:2,9,12,23 94:8,18 95:7 101:6 112:4 124:25 125:3	email 90:7,14 126:5,6,7,11,15	expected 121:24
doctors 126:18	emailed 91:24 92:2	expecting 104:5
	emailing 90:8	experience 28:19 42:8 100:12,15
	emails 125:9 126:2,3	experienced 10:24
	emphasis 123:3	explained 11:2 47:17 76:19,22
	employed 93:24 119:13	explaining 36:6
	end 16:19 45:17,23 51:3,4 52:4 67:7 71:10 112:8,20 113:3,8 128:6	explanation 127:25
	ended 59:5 98:17 113:4,11	extended 16:18,24
	enemies 29:14	extent 80:24
		extort 93:3,4,9

extortion 42:13,15 43:3 93:2	figure 20:23,25 43:19	
extra 46:8	file 102:8 121:2 129:17	
eye 113:10 123:14	filed 12:22 23:8 124:25	
eyes 33:5,7 84:16 85:5 113:18	filings 7:19,21	
	find 60:9 65:22,23 66:23,25 67:1 102:7	
F	fine 106:6,8	G
fabricated 7:2	finesse 124:9	G-R-E-G 76:5
face 32:22,25 33:3,6,9 36:10 83:13, 21,24,25 84:1,2,10,12 85:7,18	finger 81:1	gain 83:9
face-to-face 10:2,5 32:1	finish 5:19 14:25 15:19 52:6	game 59:18
faces 10:16	finished 15:1	gang 36:24 54:19 57:5,6,9 59:8 61:4
facilitate 81:19	fired 93:13 94:12,16,18,24 95:1	gangs 60:24 61:1
Facilitator 118:22	flight 106:14	Gangster 56:18,22 57:2 58:7,10,16, 19,22,24 59:2,21,23 60:4,17,19,23
fact 43:7 74:25 91:13,14,24 98:17 115:5	focusing 49:18	Gary 100:3
factor 41:4	folks 119:8	gave 10:9 17:6,7 30:10,18 35:8,9,11, 14,16,20,21 36:6,9,10,16,21 42:2,9, 14,16,17,21 44:19 47:15 52:11 56:13 71:25 73:22 74:21 88:10 115:25 127:25
facts 44:1	follow 116:23	GBCI 118:14,16
fades 7:8	force 121:20	GDS 57:16
fair 13:4,7 24:16 28:23 40:22 41:1 52:1 77:24 92:18 94:1 100:18 111:15	forgot 20:8	GED 15:19
fall 31:6 39:11	formal 17:25 23:9	general 4:20 7:6 9:2,25 10:1,24 13:3 58:25 69:13,17,18 104:10 116:11
falling 29:14	format 83:17	generally 11:11 27:5 57:1,13 58:8
familiar 56:17,21	forms 13:6,9	genuine 70:4,20
family 11:19 78:6,15,18,20 83:17 125:17,24 126:11	forward 26:2 29:25 30:4	girl 84:24
fearing 101:9	found 91:12 124:15,17,24	gist 47:16 48:2 116:9
February 46:19,20 47:1,4 49:1,9,12, 21 50:8,13,14,15,16 53:15 94:2,3 100:5	fourth 27:23	give 4:6,18,19 5:14 9:22 11:6 12:14 28:12 30:20 34:8,9,13,14,16,17,18 35:3,9,11,12,22 36:1,4,7 39:16 42:5, 11,21,22,24 43:3 83:8,10 85:15 96:21 120:24 124:19 128:20 129:20
fee 73:19 111:9	free 15:17 128:23	giving 84:7 85:1 90:13 121:5
feel 77:20 80:2 121:7	freedom 16:16	Gmail 126:9
feels 123:11	Friday 11:16	good 3:7 29:12,13,22 113:13,16
feet 106:5,6	friends 41:17,20 78:17,21 83:17 95:22 96:6,14 97:4,20,22 125:13,15, 17 126:11,16	gotcha 52:13
felt 80:16	front 6:17,18 107:5,10	gotta 18:9,13 57:23 73:13 106:12,13, 14 110:13
feuds 60:23	froze 96:18,23	gourd 82:7
fight 54:15 97:2,9 98:24 101:20,22 102:9,10,15 112:8,11,13,18,20,24 113:3,6,11,14,16	frozen 96:21,22	government 123:11
fight 101:16,17,24 102:1	Fuck 54:6,9	grade 15:23
	fucked 76:24	Gras 32:20 33:6 84:15
	funeral 73:25 75:2	Green 25:19,20,22 26:2,3,5 63:21 76:16 77:18 79:18 87:8,20 91:4,5,12,
	furnished 110:25	
	futile 81:6,9,12 100:24,25	

17,23 93:15,25 116:18 119:10 120:4,16
greeted 120:7
Greg 75:24,25 76:1,4,8,9,17,23
grounds 9:20
group 23:3,9 28:5,17,24 36:24 54:19 57:9,10 97:16
groups 57:7
Growth 57:3
guarantee 128:24
guard 43:13 81:17,19 82:11 89:12,17 98:4 107:12,14,16,21,24 108:16 110:3 120:3 122:14 123:1,3,9,16
guards 69:9 79:20 81:23,25 95:3 98:5,7 108:8 119:18 123:25 125:18
guards' 120:9
guess 4:15 7:7 8:7 20:4 25:9,12,13,15 26:8 27:9 29:21 30:8,9,18 31:24 33:15 34:5,20 35:17 41:2 43:18,21 57:4,11 62:14 68:16 79:6 84:5,6,16,23,25 95:18 98:20 106:6 107:18 112:1
guilty 16:6,8,10 124:15,17,24
guy 38:5,6 75:24,25 88:1 109:13

H

half 12:10 125:17
halfway 106:23
hall 64:1 76:10 91:8 101:5 103:23 106:21,25 107:5,10,11,19
halls 63:21,23 79:17
hallway 110:4 115:5
handcuffed 113:10
handcuffing 34:5
handcuffs 113:9
handed 72:14
handwritten 103:20
happen 23:4 26:24 31:3 39:17 42:8 58:14,15 71:3 95:16 98:11,15 102:13 123:18 126:17
happened 17:18 28:10,20 47:5 51:8 53:11 59:8 63:16 76:19,22 77:1 78:8,10,23 82:4 93:5 94:5,6,7 96:8 97:23

101:4 102:19,22 110:6 113:20 115:21 116:6 117:10,11 120:24,25 121:6 125:10 126:17
happening 28:11 32:15 98:16
harder 81:15
hardest 89:11
harm 41:24
head 5:13 40:17 48:24 51:6,8 52:3 62:11 85:15
health 6:2 103:8,10,13,21 104:2 114:5,6,9,13,18,22 118:8 119:2
hear 17:4 87:14,15 96:19,20 109:11
heard 35:21 52:1 65:5 67:16,24 70:10,12 78:20 86:5,7 87:22 88:4,6,11,12 90:24 91:2,8,10 92:15 93:4,6,7 95:3
hearing 8:21,22 11:12 18:1
hearings 29:4 60:12,16 125:5
helped 97:2
helping 23:22,25 81:19
Henderson 21:6,9 23:15,22 24:16,24 25:5,7,14,17,24 26:4,19 27:7 31:20 33:17 37:15,17,18,22 38:4 46:10,14,16,25 49:3,9,13,19 50:5,8,11,18 52:9,13 53:3,7,15,23 54:2,6,9,16,18 55:8,9,16,17 59:23 60:3 61:5 63:9 67:16,20 70:2 71:14 74:3,14 82:20 84:23 85:19 90:19 95:9 98:10,18 99:16 101:18,23 102:9,16 105:13 111:4,13 112:2 121:8 124:15
Henderson's 50:2 53:17 54:23 71:12 121:16
hey 35:21 41:10 42:9,20 43:24 44:18 62:10 86:5 88:5 99:1 101:8 108:8 127:4
high 15:19
highest 15:15,21
history 17:16 61:14 101:7,11
hit 40:17
hits 41:3
Hmm 14:23
holding 111:10
honest 65:17,18

hope 124:14,17
hospital 92:13 95:5 111:20 113:2 114:1 115:18 118:2 126:18
hostile 109:20
hours 68:11
housed 63:18
HSU 98:8,9,13 103:8,21,24,25 104:1,5,7,9,13,21,23 105:9,18,24 106:1,4,15,22 107:1,6,9,16 108:21,22 109:13,24 110:6 111:4,11 112:9 113:11,24 119:8

hurt 42:3

I

idea 23:6 31:7 64:9
identity 88:7
illegal 69:1 123:10
impact 117:16
implied 42:1
imply 54:15,17
important 66:7 99:17
impossible 87:19 98:15
impression 35:2 57:25
in-person 11:4
inaccuracies 114:12
inappropriate 82:21 83:2 91:19
incarcerated 17:12 18:17 76:16
incarceration 15:24 16:1,14,20,24 17:11
incident 31:2 37:21 38:10 53:10 94:20 96:8 97:23 101:17 102:18 103:4,5 118:17 126:3,21
incidents 49:15 52:11,12 72:4 116:20
include 83:13
including 7:20
indicted 80:1
indirect 62:23
indirectly 50:5
individual 23:2 24:6,9 31:23 32:2 36:20 69:25 88:2

individuals 124:12	intercom 105:25	juvenile 18:18
information 6:25 33:10 74:22 95:2 96:4 99:11 100:10 116:13	interested 107:8	
initial 38:10 39:6	interfere 6:3,5	<hr/> K <hr/>
initials 21:5	interrogatory 11:3	keep-separate 98:21
initiate 125:2	intertwined 38:1	keeping 73:6 99:3
initiated 20:6 125:3	intertwining 127:20	Kevin 128:2
injury 19:4	interview 95:5	kind 7:8 30:3 31:10 33:5 44:17,21 67:4 93:6 99:24 115:4,8 123:7 124:11 126:24
ink 111:23,25 112:1	interviewed 118:8	knew 10:8 26:21 31:23 32:11 41:23 44:25 51:21 55:17,22 56:13,15 66:13 74:9 84:3 93:23,24
inmate 13:2,4,8 21:4,5 30:13 60:18, 20 67:19 70:13 71:13 78:13 81:16 82:10 88:8,12 98:21,23 99:1,2,3 101:8,10,11,20 105:13,14 109:22 119:10,14,16	investigate 71:2 93:24 119:12	knowledge 19:15 20:2 29:16 36:25 41:22 49:23 69:10 100:16 121:20 127:14,17
inmates 8:25 9:1,2,6,7,9,16,25 10:3, 5,8,13,14,18 11:6,9 27:9 30:14 34:2 42:9 51:25 54:25 61:22 75:21,22,23 77:4,8 79:7,10,17 82:6,13,22 83:3,8,9, 11,20,21 84:4,5,7,8,9 86:2,5,8,10 87:11,22 88:7 89:11,16,17 90:5,8,11, 12,23,25 91:4,5 92:5,17 93:19 95:3,4 96:5 97:2,3,8 101:24 105:9 108:7 109:6 110:2 118:11 126:11	investigating 33:23	<hr/> L <hr/>
inmates' 9:13 10:9 90:12	investigator 111:16	lady 92:21
input 28:12	involved 23:5 27:24 28:3 33:22 81:22 82:11 96:3 98:4,7 125:1	language 129:19
inquiring 69:22,23 129:17	irrelevant 9:9	late 53:15 64:8
insert 111:23	issue 31:21 34:3,6 36:4 55:8 93:1 101:8,9 104:2 127:8	launch 59:13
inside 6:18 78:11	issued 40:1,3 41:7 46:1,3	law 120:11
instance 93:8	issues 6:2,5 7:12 32:14 97:13 109:17	lawsuit 12:21 13:23 19:24 20:10 23:23,25 59:16
institution 10:3,17 12:1 13:6,19 25:18 28:9 41:8,20 45:4,12 55:13 60:15 76:12,14,15 78:3,7,10,11,13 87:8 91:17,23 92:8 96:6,15 97:17,20 98:22,24 100:3 102:8,11 108:12 111:1 112:15 118:19	<hr/> J <hr/>	lawsuits 19:17 20:12
institution's 29:3	J-A-L-E-E-L 32:5	lawyer 18:11
institutions 21:11 29:6,9 62:3 90:25 91:6	Jaleel 32:5,7,8,11,12 33:10,22 34:4 35:7,9 36:5,19,23 37:17,25 38:1,3,8, 11,13 39:1,3,12,15 43:5 45:17 46:8,23 47:9,10,21,25 48:3,6 49:11,22 50:7 51:19 52:14,19,22,25 53:4,22 55:9,17 56:8 57:17 63:13 66:3,11 76:20 82:25 83:1 84:20 85:10,20,25 86:20 87:3 88:17 89:3,5,6,21 90:20	lawyers 125:18 126:11
instructions 4:19	Jaleel's 90:12	leadership 60:8,13
interacted 25:17	January 46:18 64:13	leading 46:5,13
interaction 23:16 31:13 37:22 52:4 63:4 67:10 72:2 74:20 116:16	job 15:9 113:13,17 121:15 122:17,18 123:19 124:19	learned 33:10,13 70:22 95:6
interactions 22:18 23:14 25:24 26:1, 23 27:18 49:3,18 71:23 75:9	joke 112:22,23	learning 32:18 99:8,10
	Jonathon 3:14 96:22 128:11	leave 24:19,20,21,22,24
	judge 6:17,18,20	left 25:3 71:11 118:4
	judgment 128:16	legal 4:21 7:17,18 9:14 10:14 22:20 23:7,9,21,22 24:10,11,14
	judicial 122:23 123:21	letter 53:9,10 126:1
	justice 20:24 123:2,3,9 124:2 129:3	letters 13:10,18 14:15,16 125:9,20, 21,22,25
	justification 42:12	level 15:15,18,21 80:17 106:11

lied 6:24	make 9:24 21:20 31:14 33:16 37:14 46:22 54:5,8 109:18,19 118:11	metal 110:13
life 17:19	making 55:16 95:9 116:22 124:8	mid 31:8 50:15,16
light 64:6	mama 126:16	middle 35:13 36:15,18 37:7 81:1 106:25 107:1
limit 53:13	man 18:8 41:2,11 43:9 64:5 69:22 86:5 88:5 119:24 125:17 129:9,10	middleman 36:13
limited 27:18 91:3	manipulation 124:10	might've 28:8
limits 29:5	manipulative 124:13	Miller 118:22,23
list 125:19	March 46:13 49:5,14 50:19 53:16 77:7,13 92:9,11 94:3,5,7 100:5 101:18 102:20 104:5 117:8	mind 70:21 113:12 129:17
listening 68:2	Mardi 32:20 33:6 84:15	mine 113:17
litany 119:20	marijuana 89:19,23 90:2	minute 19:23 37:12
literally 94:13	markings 84:1	minutes 61:8 106:9,17 107:15,16,19
litigate 124:7 125:23	mask 32:19,20 33:6 84:14,15	misconduct 79:22,23 80:2 123:10
litigated 124:25	masquerade 84:14	misdelivered 35:25
litigating 13:15	matched 43:20 44:2	misheard 17:10
litigation 129:6	matter 24:11,13 74:24 91:13,14,24 113:12	misleading 6:24
living 15:8	matters 23:22 24:10	mistake 35:14
lock 31:8 40:17	means 57:23 58:4 94:12,13 108:5	misunderstood 44:5
locked 102:5	meant 41:14 66:4 71:20	mixed 36:12
long 21:9 37:5,8 106:7 107:13 112:13, 17 128:7	medical 118:18 119:4	moment 14:14
longer 107:19 114:17 119:13	medications 5:25	Monday 117:22,24
looked 43:24 111:2,23 112:15	meet 21:13 22:12 25:5,6 26:4 61:15, 20 106:19 107:9	money 42:19 45:1 51:20 83:9 90:12, 13 93:3,4,9
lost 59:18	Meli 92:20	month 39:7 63:12
lot 14:5 16:20 22:21,24 23:3,4 27:25 28:14 32:10,14 35:10 44:3 49:15 77:17,18 80:23 89:9 98:5 99:19 116:15,24 117:11 120:6	member 11:21 59:2,23 60:4,7 78:14	months 39:8 103:18
loud 87:15	members 11:13,22 77:15 78:15	moral 97:12
loudly 51:23	membership 61:4	morning 68:15
loudspeaker 104:9,14	memory 6:6 7:5,8,9,11 22:9 53:5 103:3,5	mother 12:3,4,5,9,14 20:6
lower 80:17	mental 118:8	motion 8:8 129:18
lunch 64:20,24	mentioned 67:20	move 15:2 21:2 75:22 108:12
lying 88:13 94:25 116:22	mentioning 36:19	moved 63:23 101:5
<hr/> M <hr/>		
M-A-H-E-R 79:16	message 37:25 86:20 127:5	movement 108:17
made 35:14 43:5 45:19 73:14 81:4 99:13 108:14 116:20	messages 31:25 32:2 37:23,24 62:22	multiple 46:5 79:6 99:5 118:7
Maher 79:16	messing 84:24 93:19	Muslim 32:8,10 37:1,2
	met 21:16,21 22:17 25:13 36:17 105:16	Muslims 32:10 58:16
		must've 35:19
		mutual 29:19

<hr/> <p style="text-align: center;">N</p> <hr/> <p>naked 32:17 33:3,22,23 71:4</p> <p>named 32:11 75:24 79:16 93:15</p> <p>names 9:13,16 10:9 30:15,17 45:7 48:17,23 85:8 92:17 119:4 120:9</p> <p>nature 9:12 40:5 78:21</p> <p>neck 111:22</p> <p>negative 57:8</p> <p>neutral 29:12,17,20</p> <p>news 89:18,19</p> <p>nickname 32:4 76:3,7</p> <p>nineties 59:22</p> <p>nod 62:11</p> <p>nods 5:13 62:11</p> <p>normal 44:15 104:12 108:6</p> <p>North 63:20,25 64:1</p> <p>note 5:12 114:13,14</p> <p>noted 9:17 57:18</p> <p>notes 7:22 8:10,12,13</p> <p>notice 3:14 68:20</p> <p>notified 12:12 55:4 74:18 91:18 93:16</p> <p>notifies 89:13</p> <p>notify 70:3,18 127:23</p> <p>notifying 12:7 13:14,17 125:13 126:19</p> <p>November 39:9,12</p> <p>number 90:6,7</p>	<p>October 39:9,11</p> <p>October/november 46:24</p> <p>odd 104:20,22</p> <p>officer 43:11 47:12 61:21 62:2 79:15 105:1,2,7 106:20 107:4,9</p> <p>officers 79:9 89:9 94:11,15,21 110:12,17 113:13 116:1 127:18,24</p> <p>official 45:3</p> <p>officials 60:10,14 99:7,21 119:9</p> <p>one-on-one 23:14 24:17</p> <p>open 19:10,12,14</p> <p>opinion 113:17 124:19,21 125:6</p> <p>opportunity 122:3,5,7</p> <p>opposing 12:24</p> <p>opposite 51:3,4 100:13 101:14</p> <p>ordeal 76:22</p> <p>order 97:5 99:4</p> <p>organization 56:17,22,23,24 57:12 58:7 60:6</p> <p>organizations 57:1,8</p> <p>organized 60:17,20</p> <p>originally 34:22</p> <p>originals 125:22</p> <p>other's 9:15 10:16</p> <p>outlining 79:11</p> <p>over-the-tier 86:4</p> <p>overheard 48:7 72:10</p> <p>owe 42:10,21</p>	<p>107:22 108:5,8,9,10,11,13,14 109:21 110:9</p> <p>passage 7:7,10</p> <p>passes 105:21,22</p> <p>passing 27:11 61:22,24 62:11</p> <p>past 27:8,10 61:23 82:3 99:22 116:20</p> <p>pay 42:4,5,18,25 47:22 51:5,7,12,14, 17,19,20 70:14 73:13,20 74:22 82:14 93:10</p> <p>paying 70:16 73:19,24 74:24 111:9 112:3,4,7</p> <p>pen 111:14,23,25 112:1</p> <p>pending 19:5,7,9</p> <p>people 8:20 13:14,17,19 14:12 23:4 31:23 35:10 40:9 41:9 42:18 48:12,15 50:22 55:17 56:1,6,15 57:9 58:9,12, 19,25 59:1 66:9,18 69:11,12 72:18 77:21 78:17 83:23 85:3,8 86:4 87:2,5, 6,14 88:4 90:5,6 95:20 97:16 105:21 118:18 125:13 126:16</p> <p>pepper 113:18</p> <p>percent 86:24</p> <p>period 15:24 27:1,2,6 29:11 68:15 77:10</p> <p>perjury 4:25</p> <p>person 12:12 22:24 24:2,3,4 27:23 28:1 35:10,13,14,15,16,18,24 36:7,8, 9,11,18 42:10 43:8 55:1,10 74:6 81:14 86:23 89:15 91:13 92:14 99:22 101:2, 5 112:25 115:13 118:1</p> <p>person's 36:16</p> <p>personal 90:6</p> <p>personally 68:24 126:2</p> <p>perspective 29:23</p> <p>phone 29:6 90:4,6,7,9</p> <p>phones 90:4,14 91:19</p> <p>photographs 32:16 83:19</p> <p>photos 70:14,15,16 83:21</p> <p>physical 40:12</p> <p>physically 6:14,18 85:4 94:14</p> <p>picture 43:24,25 83:22 84:10 85:2,4, 6,7,15,16,17 86:1,5,14 87:4,6 88:5 111:21</p>
<hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 3:2</p> <p>object 9:19 17:15 18:8,10,12 57:22 58:3,4</p> <p>objected 18:7</p> <p>objection 9:8,17 57:14,18 59:11</p> <p>obligation 4:21 129:4</p> <p>occasions 50:11,12 98:25</p>	<hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 61:10 68:14,16 102:23 129:24</p> <p>Pamela 45:6</p> <p>paper 72:15 83:17</p> <p>paraphrasing 39:20 70:8 116:5</p> <p>part 23:10 96:1 119:12</p> <p>parties 31:22 56:2</p> <p>parts 32:22,23 33:8 85:17</p> <p>pass 104:17,18 105:22,24 106:2</p>	

pictures 32:21,24 33:1,3,7,11,13,14, 18,22,24 34:2,5,8,9,13,19,21,24 35:1, 4,9,19,20,22,25 36:1,5,17,21,22 37:6, 9,11,17,21 38:1,2 39:16 40:4 42:2 43:8,15,21 55:5,6,7 62:7 65:17,18,22, 24 66:1,2,8,10,16,20,23 69:23 70:22 71:4 73:6,7,9,10,14,16,17 74:10 83:7, 11,12,13,14,16,18,23,24 84:4,7,12,13, 21,25 85:9,11,12,22 86:3,19,22 87:2,7 88:5,13,18,19 89:24 90:2

piece 72:14

pin 70:6 87:1

place 28:13 98:13 99:4 128:22

Placement 97:24 100:20

plaintiff 19:20,22 20:9,12

plan 48:3 121:21 124:22

planning 59:19

play 40:2

played 119:13

playing 59:18

plea 16:4,5

pled 16:6,8,9

plot 96:2

pocket 129:13,15

point 88:14 104:10 115:6

police 113:8

policies 29:3 81:1,2

policy 28:10,13,19

politics 30:8

pop 66:15

popped 92:21 104:8

Population 69:13,17,18 104:10

porn 30:10,20 32:15 42:21,24 43:9, 10,13,15,17,18 44:6,10,11,15,16,18, 21,23 45:3,5,7,15,21 46:21 47:8,10, 11,12 48:4 66:25 67:1 76:20 83:7 84:5,7 85:14 89:20,24 90:13

pornographic 85:2,9 86:1

pornography 30:11,18 31:3,18 32:13 46:21

poses 43:21

position 33:17,21 60:8,13

positions 60:11

possession 44:7

potential 16:24

precautions 95:17

preceding 103:11

predominantly 62:3

prefer 25:11

prepare 128:17

present 17:11 65:5,8

press 69:9

pressed 69:9

pretty 20:23,25 29:17 51:23 66:5 103:3,5 110:24 119:17

prevent 5:22

previous 6:10

previously 24:1 44:3 66:19 115:25

price 73:7

prior 17:11 21:15,16,22,23,25 22:2 25:25 26:1 45:25 49:8 51:17,18 52:15, 17 53:21 54:2 62:8,16 66:8 76:25 101:17,22 102:9

prison 11:10 15:7 16:12 22:13 30:8 40:9 44:15 45:3 60:10,14 77:15,24 78:14 79:3,5 81:8,11 82:7 99:7,21 101:12 114:24 116:11,17 117:2 119:9, 15 122:17 126:8,10,13

prisoners 28:4 87:18

private 12:6

probation 16:12

problems 7:5,9 103:13 104:3 122:24

procedure 104:12

proceeding 6:25 20:7 125:2,3

proceedings 121:12

process 18:14 20:5 119:15,16

Program 118:22

property 29:5 97:12

proportional 9:10

prosecute 122:13 123:17

prosecution 122:20 125:5

protruding 111:22

provide 97:12 121:11,15 129:13

provided 6:24 108:6

providing 84:6

Prude 3:1,7,9,16 9:8 15:2 17:15,24 18:6 21:3 57:14,21 59:7,12 61:13 96:24 114:17 119:19 128:6,10,21 129:7,9

PSU 11:15 91:10,16,22 92:14 93:14 94:20 118:8,22,25 119:8

psych 117:15

psychiatric 118:18

psychiatrist 117:15

psychological 118:18 119:1,2

pulled 118:1

purpose 57:1,2,4

pushing 82:13 85:21

put 82:3 98:8,20,23 99:3,22 100:22 101:2,10,11 108:21 113:9 122:12,17

putting 90:12 98:12 100:13

puzzled 105:20

Q

qualified 4:15,16

quarter 106:23

question 4:11 5:4,8,20 9:21,22 16:22 18:4,16,25 55:19 57:19,24 58:5,6 96:13 98:3 101:22

questioned 55:5 98:6

questions 5:2 9:19 10:14,15,22,25 11:3,5 15:3 17:17,21 23:21 59:14 77:11 91:21 110:18 115:6,21,22 116:3 117:1,2,10 120:1 128:5

quick 92:19

quicker 20:24

quote 54:6,9,10 129:18

quoting 54:10,11,14

R		
raise 109:18	related 8:8	required 9:18 12:11 18:4
random 118:9	relates 29:3 92:6	requires 17:20 81:1 129:15
range 23:13 27:3,5 28:5 86:8 88:4	relation 106:22	resolution 112:21
ranges 87:11,23	relationship 21:8 22:14 29:10,18,19 30:2,5 89:20 91:20	resolved 31:16,17
rare 62:2 98:11	relationships 82:21 83:2 90:24	respond 10:18 41:12 48:4
reached 110:6	relatives 126:16	respondent 20:8
read-ins 16:9	released 16:14	response 17:4
reading 3:15	relevance 57:14	result 16:4
reads 96:25	relevancy 9:19,20	RESUMED 61:11
real 32:4,9 62:13 70:24 76:6 79:19 88:16,19 92:19 120:3,5	relevant 12:7 57:15 59:14	retain 125:24,25
real-life 45:5	remains 18:3	review 7:13,15,16,21,23 8:4,11
reality 84:22	remember 7:11 9:23 11:13,23 12:11, 12 13:13,22 14:2,5,9,19,20 19:3 22:18 23:14,16,19 24:12 25:8,23 26:1 28:21, 23 29:1 31:4 32:6 36:14,15 38:7 39:22,24,25 40:2,8,13,22,24,25 47:18 48:1,2,17,20,22 62:5 63:5,19,20,22 64:7,11,15,19,23 65:1 68:9 70:7 71:7 72:6 75:5 87:3,5,6 92:17,20,23 105:2, 5,6,14 109:15 116:3 117:25 118:24 120:8,10	reviewed 8:2,10 114:5,6
reason 34:14 42:7 56:13 66:6,7,15,17 70:21 77:16 80:19,21,22 93:21 117:20 123:4	remembered 43:12	rhymed 30:15 35:5
reasons 115:25 118:9 119:1 127:21	remotely 6:20 69:3	ring 84:6
recall 27:12 85:8 119:22	repeat 23:12 63:1 77:5 96:13	risk 100:23
received 83:16	repeatedly 101:1	robbery 16:2,6,9,10
recess 61:9	rephrase 53:2 93:18 101:22 107:7	rode 10:4
reckless 19:4	report 70:21,25 71:6,9,15,18 75:19 77:20,22,23 79:21,24 80:6,8,11 81:7, 13,18 83:12 98:19 102:2	rodeo 4:18
recognize 87:25 88:9	reported 98:25 99:16,17 100:1,2,3	role 60:6
record 9:17 58:3 60:10 69:7 102:2,7 128:8,9 129:8,23	reporter 3:13 5:11 15:13 96:20,25	room 48:16 51:4,22 106:15 110:10,24
recorded 69:8	reporting 80:3 82:5,7,15,16 99:20 100:12	rotating 41:17
recording 69:1,3,4	reports 60:15 121:1	rotten 123:24 124:1,3
records 20:23 69:6 102:8 114:5,6,10, 13,18,22	representative 20:25	roughly 46:23
red 120:3,4,5	request 69:5 97:24 100:20 103:16,20 128:11,14,24 129:20	rounds 118:10
refer 21:5	requested 102:12	route 107:8
referring 74:17,20	requesting 92:7 128:10 129:11,12	rules 18:7 116:23
refers 21:4	requests 8:7 13:2,4 97:25 103:10 123:6 129:11,14	rumor 84:21 88:15 91:3
refused 116:25		rumors 34:1 90:15,23 91:7
refusing 9:20 18:5,10,13 57:20 58:1		running 84:5
regular 68:11 110:1,16		ruse 42:18
reiterating 47:25		
		S
		safety 40:11 70:19 92:1,5,6 99:20 100:22 101:10
		sandals 52:7
		Saturday 117:21
		scare 105:22

scene 111:2	Sheriff's 127:15,19,22	sounds 4:17 16:20 45:12 87:15 97:15,17
school 15:19	shirt 80:7,9,11 93:14 113:9	South 63:20,24
Scoop 30:15	shirts 79:8,10 80:4,16	span 17:19
screen 96:18	shit 42:25 74:24	speak 11:25 31:20 46:16 58:11 109:6 120:7,18
search 65:21,23 66:22 88:21,22	shook 51:6,8 52:3	speaking 29:23
seat 110:10,19,22,23	shortly 129:1	special 89:14 97:24 100:20
seconds 112:16	show 32:22,24 33:3	specific 4:12 7:9 10:9 23:23,25 25:23 27:12 40:18,25 44:17 45:12 47:23,24 48:1,2 51:16 61:2 83:10 85:8 87:1 100:16 116:3,13,20 117:21,25 118:7
secret 83:7 84:18	showed 32:22 111:21	specifically 8:6 15:4 17:20 28:21 38:3 41:9,23 64:7 65:25 71:18 73:20 100:11 111:24 116:5 120:2
secretary 127:9	shower 46:18 47:4,16 48:12,16,20,22 49:20 50:8,10,20 51:4 52:6,11,12,21, 23,25 53:1,2,6,23 95:11	specifics 40:15 41:25
security 36:23 54:19 70:3,18 71:9,10, 16,17,19 74:14 80:19 82:2 91:25 92:2 114:24 115:4,8	showers 61:23	spell 15:13 91:11
seeking 129:14	shown 124:12	spoke 11:13 37:18 38:13 46:14 55:24
Segregation 26:18,21,24 69:12,14, 16 92:12	shows 113:5	spoken 6:8 62:8
sell 59:1 83:20 85:11	shrugs 5:13	Spook 30:12,13,15 35:6,20
selling 34:2 83:7 84:3,8 85:1	single 12:12	spot 11:5
send 14:15,16 31:24 32:2 72:18 125:25 126:20,22,23 127:1 128:23,24	sitting 110:17	spray 113:18
sending 90:11,13	situation 30:9 31:16,25 32:1 42:6 76:19,20,21 95:6 96:16 97:5 101:4 107:25 116:6 118:6 119:21 120:17 121:22 122:1,13 123:15 124:20,21	stab 40:7,16
sense 108:14	situations 84:11 99:5 100:25	stabbed 78:18,20 91:21 92:4,9,10,13 111:8,13,14 112:9,10,23 113:1 117:21 119:17 122:14 125:14 127:24
sentence 16:11,12,13,17 17:7,8	skeptical 124:11	stabbing 53:10,12,13,16,21 54:3 63:7 67:18 70:1 74:15,17 78:24 94:1,2,5,7 114:24 115:2,7,8,17 118:17 119:9 120:12 121:9 124:24 125:9,10
sentenced 16:23	skip 26:2 29:25 30:4	stacked 87:12
separate 82:10,12	skipped 30:3 49:15,16	staff 11:10,13,21,22 77:15,18,24 78:14 79:3,4,5,6,13,15,22,23 80:1,5 91:10,15 92:7 94:16 114:24 116:11 117:11 119:1,5,9,15,21,24 120:6
separated 100:24 101:13 102:12	skipping 46:12	stairs 106:11,14
separation 97:25	slip 98:8,13 108:21	stall 52:6
September 39:9	smuggle 89:16	stand 110:21
sergeants 110:15	smuggled 88:24 89:7	standing 48:17 68:1,3,5 87:13 107:12 110:14
Service 103:10	smuggling 79:19 80:5 89:14,19,23 90:3,4 123:1	stands 47:21 48:5
Services 103:8,22 119:2	Snoop 30:15	star 45:7
set 33:7 87:23 90:14 98:12 118:7	soap 42:10,11	
sexual 89:20 90:24	social 57:7,10 120:9	
shakes 5:13	sock 40:17	
shared 99:11	sold 85:12	
shares 23:6	solidified 84:19	
she'd 71:6 118:12	sort 62:22 97:13	
she'll 67:4,6	sound 102:23	
sheriff 120:15		

stars 45:5	supervisor 93:15	terminated 79:6
start 15:4 67:15 75:22 96:24 97:16 103:6	supervisors 79:10,11 82:2	terms 29:12 50:4 55:15 89:22
started 32:15 34:7 37:6 50:25 65:13	supplies 61:23	TERRANCE 3:1
state 59:10 114:18	support 20:4,6 97:12	testified 3:3 14:14 79:3
stated 23:20	suppose 82:20	testify 56:9 121:16,18 122:2,4,8
statement 54:5,8 115:9,11,14	supposed 32:15,16,18,21,24 33:4,7, 14 35:18 36:16,20 44:19 63:7 67:17, 18,19 69:25 70:10,11,13,25 74:15 92:22 96:1 101:3,6 116:23	testifying 5:22 123:18
statements 121:5	supposedly 89:23	testimony 6:11,12,19 55:18,20
station 110:16	surgery 113:22	Textbehind 32:21 83:14,15,16
status 26:22	surroundings 95:19,21	theft 18:18,19,23 19:4
statuses 29:8	suspicious 98:6	thing 25:10 34:7 36:17 44:15 59:16 69:10 70:22 81:16 89:16 119:18 128:25 129:2
statute 17:17,20	sworn 3:2	things 5:15 7:8,22,25 8:1,8 9:11 11:1, 19 14:1,5,8 18:2 29:7 37:14 62:11 70:8 80:25 86:6 89:11 91:18 95:21 100:24 116:22 117:12 126:11,18
stay 121:3	system 116:1 122:12,23,24 123:21, 22 126:10,14	thinking 35:7 71:1 88:21
stayed 16:12 17:8 25:1		third-party 37:24
stereotype 57:8		thought 14:2 30:17,21 31:3 33:12,21 34:4,15,18 36:8,25 37:1 44:17 54:13 66:10 73:6 77:23 81:6 86:9,10,23 100:19 104:22 105:23,25 107:3 116:10 127:25
stick 37:14		threat 36:24 40:1,3,5,11,18 41:3,6,13 43:5,6 45:24 46:1,3,5 47:20,21,25 54:19 55:1,10 69:24 70:19 73:11,13 74:18 81:20 82:10,11 91:15 95:10 97:10 99:12
stood 62:4		threatened 88:20 95:10
straight 114:1 116:18		threatening 40:21,24 45:20 81:17
strategically 98:12		threats 31:14 41:7 46:6 54:23,24 55:15 56:14 82:6 95:8
strategies 9:11		three-quarters 106:24
strategy 7:22 8:12,13		Thursday 11:16
stuff 13:3 19:10 21:12 32:23 35:11 59:1 77:17 80:23 99:20 113:10 116:15,22		tier 23:11,13 28:1
subject 24:12 122:23		time 4:20 5:18 7:7,10 17:6 22:7,9,19 24:15,24 25:10 26:11,17,18 27:2,4,9, 13,16,22 30:1 31:14,15 36:15 37:10 39:3 41:19 43:19 48:21 63:18 64:3,18, 22 68:9,15 69:14,16,20,23 72:5,6,7,8 73:8,10,14,18 74:13,16 77:10,12,13, 17 79:18 100:19 105:10 106:17 107:4 108:3,4 118:4,7,12 125:23 127:9
submit 97:24 100:19 103:20 123:5		timeline 46:22 49:8
submitted 7:2,25 8:3 13:5 54:12 99:9,18 103:10,16 112:15		
substance 12:8 33:12		
sudden 73:11,12		
sued 19:25		
sum 53:20		
summary 13:7 53:24 77:25 100:18 128:15		
summer 31:6,11 37:7 39:6		
Sunday 117:22		
super 4:18		
supervision 16:19,25		

times 3:19 4:4 6:19,22 22:21,24 27:8
35:10 37:10,16 38:13,16,17 43:25
46:13 72:3 118:9 127:7

title 57:7 60:8,13,14

Titus 21:6,9 23:15,22 24:16,24 25:5,
14 26:4 34:4 35:8 46:10 53:1,3,7 55:8,
9,15 56:8 57:16 59:23 60:3 61:4 63:9
66:3,11 67:16,20 70:2 71:12,14 74:3,
14 76:21 82:20 84:23 85:10,19 86:21
88:17 89:21 90:19 98:9,18 99:11,16
101:18,23 102:9 105:13 111:4 112:2

today 4:22,25 5:23,25 6:2,5 7:14 8:16,
19,21,24 9:4 10:12 11:7 129:19

told 9:25 11:18,19 13:21,24 14:6 17:6
35:5,17,19,22 40:14 43:9 44:2,3 45:14
47:6,8,10 48:5 51:13 55:5 56:10 57:22
63:6,8 65:17,18,22 66:8,25 67:16
69:24 70:2,12,15 73:23 74:2,3,7,13,
19,21,22 78:8 80:15 84:14 85:8,10
87:2,4 89:2 91:1,12,22 92:2,3,4 93:19,
20,21 94:8,19 97:21 101:6 103:17
104:7,13,16,20 106:1 108:20,24
110:23 111:21 116:7 119:12 121:2

tool 11:2

top 48:24 87:12

topic 29:9 79:2

total 72:3

towel 47:7

transcript 128:12,13 129:5

transfer 25:3,20 118:15

transferred 26:3 28:9 92:7 116:17
118:5,16

transported 108:3,5,7

transporting 35:19 61:22

treated 113:23 119:5

treating 118:14

treatment 29:8 106:15 107:20 113:21
114:19

trial 16:3 121:17 122:2,4,8

trick 42:18 44:24

triggered 31:19 73:17

true 46:12,15 86:10,12,13,17 90:10,16

trust 79:24 81:5,13,16 98:4,19 99:20,
23 101:12 116:7,10

trusted 84:11 96:7,15

trusting 115:25 116:1 124:11

truth 4:22,25 6:3

truthfully 5:23

turn 40:4 41:11 47:7,20,22 55:7 70:14
123:13

turned 52:5 68:25 69:2 86:11 111:14

type 6:15 30:16 32:1 43:15 59:1 89:14
97:7 117:16

types 32:25 58:25 77:19 80:2

U

uh-huh 5:16

ultimately 18:2

unclear 107:7

undergrad 15:19

understand 4:21,24 5:4,7 18:7,8,14
29:25 34:20 40:19 45:19 49:18 56:12
68:18 78:12 87:21 108:22

understanding 33:16 74:6

understood 5:8 10:16 17:3 40:21
47:24 128:3

unexpected 105:22

Unit 103:8,22 119:3

unsure 4:7

unusual 105:23,25 107:24

upside 40:17

V

vent 10:14

vents 10:7,15

verbal 5:15

Verbatim 39:23

versus 57:7,9 127:18

vicinity 30:17

video 110:25 112:14 113:4,5

view 45:1

violence 40:12 99:14

visit 78:8,10

visited 10:4 87:20

visits 11:19

voice 87:25 88:9

voices 87:14

W

W-O-L-F-F 91:11

wait 128:15

waiting 110:10,24

walk 27:10 45:22 106:7,9,12,13
107:13 109:16 110:13

walked 27:8,19 47:6 51:8 52:5 67:4,6
73:24 75:2 79:13,16 93:17 94:8,11,12,
14,17,22 95:7 110:7 123:4

walking 51:11 61:23 95:20 107:19
109:7 110:3,4

wanted 30:21 34:9,15,18,25 42:4
45:11 72:19,24 73:3 74:16,19 120:24
126:17

wanting 99:14 121:3

war 16:15 97:17

warden 99:25 100:1,2,6,8 102:12

warm 31:10

Was't 67:25

waste 100:19

watch 95:19,20,23 97:11

Waupun 25:4,5,7,14,16,23,24 116:16

waved 51:3,5

weapons 81:24

wear 69:13

wearing 65:9,11 68:20

week 11:18 12:10 118:3,10

weekday 117:23

weeks 103:11

white 62:3 79:8,10 80:4,7,9,11,16
93:14

winter 31:6

wire 72:18,25

withhold 124:9
Wolff 91:10,11,16,22 92:15,25 117:3,
19 119:7
won 112:18,19,24
wondering 78:17,19 81:21,22
word 39:18,19 40:2 74:7 94:9
worded 70:7
words 40:22,25 48:1,2 81:6 111:3,5
wore 69:11
work 5:21 110:15 123:2,8
worked 69:12 76:10 91:1,12
worker 11:16 91:10,16,22 93:14
118:22,25
working 81:14 122:25
worry 109:19
would've 43:12
writ 13:16
write 13:18 125:12,22 126:3,7
written 12:20,25 14:10,11,19 27:15
62:15,21 72:16 75:11 125:8,9
wrong 3:16 31:9 35:14,16 42:6 69:11
86:23

Y

y'all 20:22 28:2 36:9 47:9,13,14,15
122:13,19 123:17,19 124:5,6,7,8,21
125:4
y'all's 123:20 125:4
Yahoo 126:9
year 14:4 25:8 103:18 125:16
Year's 64:13
years 16:12,18,23 17:9,19,22,23
21:11 25:10 102:5,15